

Policy Name : **Modern Slavery and Human Trafficking Policy**

Related : MOHESR Outcome-based Evaluation Framework (OEF), ADEK Standards and Procedure for

Documents Higher Education Institutions in Abu Dhabi 2023, ESG 2015 Standards.

Section 1 : Purpose

1.1 The purpose of this Policy is to establish ADSM's commitment to preventing modern slavery and human trafficking in its operations and supply chains, and to set the principles by which related risks are identified, assessed, reported, and addressed.

Section 2 : Scope and applicability

2.1 This Policy is applicable to all ADSM employees, faculty, staff, contractors, service providers, recruitment agents, suppliers, and any other third parties engaged by or acting on behalf of ADSM.

2.2 This Policy applies to ADSM's operational activities, employment practices, purchasing decisions, contracting activities, and supplier relationships.

Section 3 : Definitions

3.1 **Modern Slavery:** Exploitation of a person for personal or commercial gain, including forced labour, bonded labour, servitude, slavery, and human trafficking.

3.2 **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons through coercion, deception, abuse of vulnerability, or other improper means for the purpose of exploitation.

3.3 **Supply Chain:** The network of suppliers, contractors, service providers, and other third parties that provide goods or services to ADSM.

3.4 **Supplier:** Any external party that provides goods, works, or services to ADSM.

3.5 **Due Diligence:** Reasonable steps taken by ADSM to identify, assess, prevent, mitigate, and address risks related to modern slavery and human trafficking.

Section 4 : Policy Statement

4.1 ADSM is committed to conducting its activities ethically and with integrity and adopts a zero-tolerance approach to modern slavery and human trafficking.



- 4.2 ADSM shall take reasonable and proportionate measures to prevent modern slavery and human trafficking within its operations and supply chains, and respond promptly and effectively to any concern.

Section 5 : Exclusions

- 5.1. None.

Section 6 : Principles

- 6.1. ADSM shall not knowingly engage in, support, or tolerate any form of modern slavery or human trafficking.
- 6.2. ADSM shall expect all employees, suppliers, contractors, and service providers to comply with applicable laws and regulations and to operate in a manner consistent with this Policy.
- 6.3. ADSM shall consider modern slavery risk as part of its institutional risk awareness and, where appropriate, reflect relevant risks through its risk management processes as per the *Risk Management Policy*.
- 6.4. ADSM shall seek to reduce modern slavery risks in its supply chains through reasonable due diligence measures before and during supplier engagement.
- 6.5. ADSM shall require, where appropriate, that suppliers and contractors confirm that they do not knowingly participate in slavery, forced labour, human trafficking, or other exploitative labour practices.
- 6.6. ADSM shall reserve the right to request supporting information, clarifications, or corrective actions from suppliers or contractors where concerns are identified.
- 6.7. ADSM shall treat any allegation or indication of modern slavery or human trafficking seriously and shall review such concerns promptly, fairly, and confidentially to the extent reasonably possible.
- 6.8. ADSM shall not tolerate retaliation against any individual who, in good faith, reports a concern related to modern slavery or human trafficking.
- 6.9. Concerned Unit Heads shall ensure that modern slavery considerations are appropriately reflected in supplier engagement, contract oversight, and operational practices under their responsibility.
- 6.10. The Human Resources Office shall support implementation of this Policy in relation to recruitment and employment practices.
- 6.11. ADSM shall promote awareness of this Policy among relevant employees involved in recruitment, procurement, contract management, and operational oversight.
- 6.12. ADSM shall maintain appropriate records of supplier reviews, reported concerns, and actions taken under this Policy.

Section 7 : Procedures

- 7.1. Prior to entering into, renewing, or materially extending a supplier or contractor relationship, the concerned unit shall consider whether the engagement presents a reasonable risk of modern slavery or human trafficking.
 - 7.1.1. The concerned unit shall review the nature of the goods or services being procured, the type of labour involved, and any other relevant risk indicators.
 - 7.1.2. Where appropriate, the concerned unit may request a supplier declaration, policy statement, contractual undertaking, or other supporting evidence confirming compliance with applicable labour and ethical standards.
- 7.2. Employees involved in supplier engagement, recruitment, or contract oversight who identify a concern shall report the matter to the Policy Owner and, where appropriate, to the President.
 - 7.2.1. Reported concerns may include allegations, suspicious practices, refusal to provide reasonable assurances, or credible information suggesting exploitative labour practices.
- 7.3. Upon receiving a concern, the Policy Owner shall review the matter and determine the appropriate course of action.
 - 7.3.1. Such action may include requesting clarification, seeking further evidence, consulting relevant internal units, requiring corrective action, suspending engagement, or recommending termination of the relationship, subject to contract terms and applicable laws.
 - 7.3.2. If there is reason to believe that applicable laws may have been breached, the matter shall be escalated to the President for any further action deemed necessary, including referral to the relevant authorities where appropriate.
- 7.4. The Human Resources Office shall ensure that ADSM's recruitment and employment practices remain consistent with ethical standards and do not knowingly facilitate forced labour, coercion, or exploitation.
- 7.5. Relevant administrative units shall support periodic awareness of this Policy for employees whose duties include procurement, recruitment, supplier management, or compliance oversight.

Section 8 : Responsibilities

- 8.1. The President shall cause this policy to be implemented.
- 8.2. The Head of Finance shall monitor implementation of this policy and report violations.



Section 9 : Cancellations

9.1. None.

Section 10 : Review Statement

10.1. ADSM's Policy Committee shall review this Policy at least annually. This Policy may be reviewed more frequently based on a request from the President, Policy Owner or in response to changes in applicable regulations and standards. Reviewed policies shall be recommended and approved in accordance with ADSM's P 110 – Policy on Policies.

Section 11 : Approval

Authorization / Ownership	Signature and Date
Policy Owner: President	
Approved by: Executive Committee	Minutes of Meeting on 25/06/2026

Section 12 : Revision History

Revision No.	Effective Date	Description
0	25/06/2026	Policy First Approved

Next scheduled review: 25/06/2027

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