

East European University

Modern Slavery Policy

I. Purpose

1. The purpose of this Policy is to prevent, detect, and eliminate all forms of modern slavery, forced labour, human trafficking, and labour exploitation at East European University, within a risk-based due diligence approach.
2. The Policy affirms the University's commitment to:
 - respecting and protecting human rights;
 - ethical and responsible governance;
 - ensuring transparent and sustainable operations.

II. Scope of Application

1. The Policy applies to the University's:
 - academic, invited, and administrative personnel;
 - students - to the extent they are involved in work, internships, or employment-like relationships;
 - contractors, suppliers of goods and services;
 - donors and partners - within the framework of cooperation with the University.
2. The Policy applies to:
 - the University's internal operations;
 - the supply chain;
 - all contractual and informal relationships related to the University's activities.

III. Legal Basis

The Policy is based on:

- international principles for the protection of human rights;
- the fundamental conventions of the International Labour Organization (ILO);
- standards of corporate social responsibility and ESG;
- applicable legislation, the University's Charter, and internal regulatory acts.

IV. Key Definitions

1. **Modern slavery** - forced labour, slavery, compulsory performance of services, human trafficking, or other forms of labour exploitation.
2. **Forced labour** - any work or service exacted from a person under threat, violence, or coercion, without their free consent.
3. **Human trafficking** - the buying or selling of a person, or any other illegal transaction involving a person, as well as the recruitment, transportation, transfer, harbouring, receipt, or sheltering of a person by various means for the purpose of exploitation.
4. **Supply chain** - the entire process of supplying goods and services associated with the University's activities.

V. Core Principles

The University is guided by the following principles:

- zero tolerance toward modern slavery;
- respect for human dignity;
- prevention-oriented approach;
- transparency and accountability;
- responsible partnership.

VI. Preventive Measures

1. The University takes measures to:
 - identify and assess risks of modern slavery;
 - apply ethical criteria in the selection of suppliers and contractors;
 - include provisions for the protection of human rights in contracts.
2. In high-risk areas, the University is entitled to:
 - request additional information or documentation;
 - terminate cooperation in cases of substantiated suspicion or confirmed violation.

VII. Supply Chain Management

1. Suppliers and contractors are obliged to:
 - comply with labour rights and legislation;
 - refrain from using forced or exploitative labour;
 - cooperate in monitoring and audit processes.
2. The University is entitled to conduct:
 - requests for self-assessment;
 - risk-based due diligence;
 - termination of contracts in case of violations.

VIII. Awareness Raising and Training

1. The University promotes awareness of modern slavery risks.
2. As necessary, it conducts:
 - training for relevant personnel;
 - informational activities for students and partners.

IX. Reporting and Protection

1. Any person has the right to report, in good faith and based on reasonable suspicion, a possible case of modern slavery.
2. Reports may be made to:
 - the immediate supervisor;
 - the Quality Assurance Service;
 - a confidential channel designated by the University.
3. The University ensures:
 - confidentiality;
 - protection against retaliation.

X. Response and Remediation

1. Upon detection of a possible violation, the University:
 - conducts an investigation of the facts;
 - takes immediate measures to mitigate harm;
 - terminates cooperation if necessary.
2. Responses are carried out in a manner that is:
 - timely;
 - proportionate;
 - ethical and legally sound.

XI. Monitoring and Reporting

1. Compliance with the Policy is monitored by the Quality Assurance Service.
2. Aggregated information may be reflected in:
 - internal quality reports;
 - sustainable development reports;
 - institutional self-assessment documents.

XII. Violations and Sanctions

1. Violations of the Policy entail responses in accordance with applicable legislation and the University's internal rules.
2. Sanctions must be:
 - fair;
 - proportionate;
 - transparent.

XIII. Policy Review

1. The Policy is subject to periodic review, but at least once every three years.
2. Amendments are approved by the Representative Council.
3. The updated version is published on the University's website.

XIV. Entry into Force

1. This Policy enters into force on the date of its approval by the Representative Council.