



LUMINA OPEN UNIVERSITY: MODERN SLAVERY STATEMENT

1. Introduction

Lumina Open University (hereinafter referred to as “the University”) is committed to ensuring that modern slavery, human trafficking, and all forms of exploitation are not tolerated within its operations or supply chains. This Modern Slavery Statement outlines the University’s commitment to preventing modern slavery and human trafficking in accordance with the Modern Slavery Act 2015 and other relevant legal and ethical standards. This statement sets out the steps the University is taking to combat modern slavery within its operations and its supply chains, ensuring that human rights are respected and upheld.

2. Organizational Structure and Supply Chains

Lumina Open University is a higher education institution that operates both locally and internationally, providing degree, diploma, and postgraduate programs through online learning. Our diverse supply chains include services, contractors, and suppliers who provide a range of goods and services essential for the operation of the University.

We recognize that modern slavery and human trafficking can exist in various sectors, including but not limited to education, technology, administrative services, and facilities management. The University is committed to acting with integrity and transparency in all its business relationships and strives to ensure that modern slavery does not exist in any form within our operations or supply chains.

3. Our Commitment to Preventing Modern Slavery

Lumina Open University is committed to upholding the principles of respect for human rights, dignity, and fairness in all our activities. We are actively working to identify, assess, and manage risks of modern slavery in our supply chains and business operations. The University has taken the following steps to ensure modern slavery does not take place within our organization:

- **Policy Development:** The University has established policies and procedures that promote ethical business practices and prohibit the use of forced, bonded, or child labor. These policies apply to all employees, contractors, suppliers, and third-party service providers engaged with the University.
- **Due Diligence:** We carry out due diligence and risk assessments on new suppliers and partners to evaluate their policies and practices regarding modern slavery. We ensure that these assessments focus on key risk areas, such as labor practices, employment conditions, and worker rights.
- **Training and Awareness:** The University provides training to employees, contractors, and suppliers on the risks of modern slavery, human trafficking, and unethical labor

practices. This training equips our staff to identify and respond appropriately to any indicators of modern slavery in our operations or supply chains.

- **Contractual Obligations:** In our contracts with suppliers, service providers, and other third parties, we include clauses that require compliance with the University's commitment to combat modern slavery. Suppliers must provide assurances that they operate in accordance with all relevant laws and regulations, including those relating to labor standards and human rights.
- **Monitoring and Auditing:** The University monitors and audits its suppliers to ensure they meet our ethical standards. Any suppliers or contractors found to be in violation of our policies are subject to corrective action, which may include contract termination or the imposition of penalties.

4. Risk Assessment and Due Diligence Process

Lumina Open University recognizes that modern slavery can occur in various forms and in different industries. Our due diligence process includes conducting regular risk assessments to identify areas where modern slavery may be present or where we may have exposure to it in our supply chains. These assessments include:

- **Identifying high-risk areas:** We focus on industries, geographies, and sectors known to have higher risks of modern slavery, such as low-wage labor industries, agricultural production, and construction.
- **Supplier engagement:** We engage directly with our suppliers to understand their practices, policies, and the steps they take to ensure their operations are free from modern slavery.
- **Continuous evaluation:** We continuously evaluate and update our risk assessments to reflect changes in laws, regulations, and best practices.

5. Employee and Worker Rights

Lumina Open University is committed to ensuring that all employees are treated with dignity and respect. We uphold the rights of all employees, ensuring they are provided with fair wages, safe working conditions, and the opportunity to work without fear of exploitation. Specifically, we ensure that:

- **Employment is voluntary:** All employees must voluntarily enter employment without coercion or exploitation.
- **Freedom of movement is respected:** Employees should be free to leave their employment after reasonable notice without facing threats or restrictions on their freedom of movement.
- **No use of child labor:** We adhere to child labor laws and ensure that no one under the legal working age is employed by the University or its suppliers.
- **Fair wages and working conditions:** We ensure that employees receive fair remuneration and work in safe, healthy conditions, as required by law.

6. Reporting and Grievance Mechanism

Lumina Open University provides a confidential reporting mechanism for employees, contractors, and stakeholders to report any suspicions or knowledge of modern slavery, human trafficking, or unethical practices within our operations or supply chains. This mechanism ensures that any concerns are addressed promptly and appropriately.

Individuals who believe they have witnessed or been subjected to modern slavery can report their concerns to the University's Human Resources or Ethics Committee. The University has established clear processes for investigating allegations, protecting whistleblowers, and taking appropriate corrective action.

7. Continuous Improvement

Lumina Open University is committed to continuously improving its efforts to combat modern slavery and human trafficking. We will regularly review our policies and practices to ensure they are effective in preventing modern slavery. Additionally, we will keep up to date with changes in relevant laws, best practices, and new approaches to ensuring supply chain transparency.

We will also maintain an open dialogue with stakeholders, including employees, suppliers, students, and external organizations, to share knowledge and improve practices.

8. Conclusion

Lumina Open University is fully committed to preventing modern slavery and human trafficking in all its operations and supply chains. We recognize the importance of ethical behavior in the education sector and strive to create a safe, fair, and transparent environment for all individuals engaged with the University. Through this statement and our actions, we reaffirm our commitment to the protection of human rights and the eradication of modern slavery in all its forms.

This Modern Slavery Statement applies to all areas of the University and will be reviewed annually to ensure ongoing effectiveness and compliance.

Signed:

Dr. A. O. Jegede

Chairman Board of Trustee

Lumina Open University