Marine Habitat Preservation of the Philippines Inc.
SEC Reg. No. CN201506332
Siit Arboretum, Barangay Lutoban
6218 Zamboanguita, Negros Oriental, Philippines
marineconservationphilippines.org

Anti-Slavery and Labour Standards Policy

How we keep modern slavery out of our work and our supply chain
Marine Habitat Preservation of the Philippines Inc. (Marine Conservation Philippines)

Version	1.0
Approved by the Board	October 2026
Next scheduled review	October 2028 at the latest
Policy owners	Kiri Simons and Jason Matthews, General Managers

1. Our Commitment

Marine Conservation Philippines (MCP) does not tolerate modern slavery in any form, either in our own work or in the work of our suppliers. Everyone who works for us chooses to do so, receives full pay on time and is free to leave.

This policy sets out the standards we hold ourselves and our suppliers to, how we check that they are met, and what anyone can do if they have a concern. MCP is the name under which Marine Habitat Preservation of the Philippines Inc, a non-stock, non-profit organisation founded in 2015, does its work.

2. Who This Policy Covers

This policy covers everyone who works with or for MCP and all our operations in Negros Oriental:

- our directors, Board members and staff, including our ocean plastics collection team
- interns, volunteers, scholars and other people taking part in our programmes
- suppliers, contractors and service providers we pay, and any workers they bring onto our base or project sites
- partner organisations, for the work we do together

3. What We Mean by Modern Slavery

Modern slavery is when a person is made to work, or kept in work, against their will through threats, force, deception or debt. It includes:

- forced or compulsory labour
- debt bondage, where a person works to pay off a debt they can never clear
- human trafficking, meaning recruiting, moving or holding people to exploit them
- servitude
- child labour, meaning work below the legal minimum age, or work that harms a young person's health, schooling or development

Common warning signs are fees charged to get a job, employers holding on to workers' passports or IDs, wages withheld or paid late, debts owed to an employer, and workers who are not free to leave their workplace or accommodation.

4. Laws and Standards We Follow

We comply with Philippine law, including:

- the Labor Code of the Philippines, which sets the rules on wages, working hours and rest days, and a minimum employable age of 15
- the Expanded Anti-Trafficking in Persons Act of 2022 (RA 11862), which amends the Anti-Trafficking in Persons Act of 2003 (RA 9208)
- RA 9231 on the elimination of the worst forms of child labour, which bars anyone under 18 from hazardous work

We also respect the International Labour Organization's conventions on forced labour (C29 and C105) and child labour (C138 and C182).

MCP is not required to report under the UK Modern Slavery Act 2015 or Australia's Modern Slavery Act 2018. We have written this policy with their guidance in mind, so that partners who report under them can rely on it.

5. Our Staff

Our Filipino team has up to 35 regular and casual staff, including our ocean plastics collection team. We also employ international staff in science, dive instruction and management. The following applies to everyone we employ:

- **Work is freely chosen.** Nobody is made to work through threats, penalties or debt, and every staff member is free to resign with the notice the law requires.
- **No fees for jobs.** Applicants and staff pay nothing for recruitment, and we do not use agents who charge workers.
- **Documents stay with their owner.** We never hold on to anyone's passport, ID or other personal documents. Where we need a copy for our records, the original goes straight back.
- **Written terms.** Every regular employee receives a contract or another written outline of their employment terms.
- **Fair pay.** Pay is at least the legal minimum wage, paid in full, on time and directly to the worker, with 13th month pay for everyone and all mandatory contributions to SSS, PhilHealth and Pag-IBIG. We make no deductions beyond those the law allows.
- **Working hours.** Working hours, overtime and rest days follow the Labor Code. All overtime is voluntary and paid.
- **No child labour.** We do not employ anyone under 18.
- **Freedom of movement.** Any housing and meals we provide are benefits, never a debt, and staff are free to come and go outside working hours.
- **Freedom of association.** Staff are free to form or join a union or workers' association.

We employ our ocean plastics collection team directly, paying a wage rather than a rate per kilo collected.

Casual workers, for example in grounds work, are paid above the daily minimum wage and are covered by every commitment in this section.

6. Volunteers, Interns and Scholars

Volunteers and interns choose to join our programmes and pay to take part, so they are participants rather than workers. Our local Filipino scholars take part at no cost.

- Anyone taking part is free to leave the programme at any time.
- Participants keep their own passports and documents.
- Volunteers never replace paid local jobs. Kitchen, grounds, maintenance, transport, security, school teaching and ocean plastics collection roles are all held by paid Filipino staff.

Volunteers carry out our reef surveys because there is no public budget for monitoring at this scale, and their fees pay our local team's salaries.

7. Suppliers and Contractors

We expect everyone we pay for goods or services to treat their own workers to the standards in section 5. Much of what we buy, such as food, comes from local markets and businesses, so we can see much of our supply chain ourselves. We use no building contractors: we hire and direct building work ourselves, under the standards in section 5.

- **Contract clause.** Contracts above PHP 250,000 require the supplier or contractor to follow this policy, pay at least the minimum wage and bring no one under 18 to work on our sites.
- **On-site checks.** Whoever manages a contractor for MCP keeps an eye on working conditions on site, including that no one under 18 is working, and raises any concern with a General Manager.
- **Manufactured goods.** We buy solar panels, IT and dive equipment, and other manufactured goods from reputable brands and established dealers. We are several steps removed from the factories that make them, and our dealers cannot trace the source of every part, so we cannot check working conditions there ourselves.

8. Where Our Risks Lie

Because we hire and direct all our workers ourselves, building work included, we have found no risk of modern slavery in our own operations. What risk remains lies in what we buy, mainly goods made far from here:

Area	Risk	Why	How we manage it
Solar panels, IT and dive equipment, and other manufactured goods	Medium	Global manufacturing, some of it in sectors with known labour concerns, several steps removed from us and beyond our ability to trace	Buying from reputable brands and established dealers (section 7)
Food	Low	Bought locally, and we serve no seafood on base, so commercial fishing, a sector with known labour risks worldwide, is not in our supply chain	None needed
Our own staff	None identified	Directly employed under Philippine law	Section 5
Casual workers, including building work	None identified	Hired and directed by us, as we use no building contractors	Section 5

Area	Risk	Why	How we manage it
Ocean plastics collection	None identified	Employed directly and paid a wage rather than by the kilo	Section 5
Volunteers and interns	None identified	Pay to take part and free to leave	Section 6

9. Raising a Concern

Anyone can raise a concern through our Grievance Mechanism, including staff, volunteers, contractors' workers and members of the public. It costs nothing, can be done anonymously and will never be held against the person who raises it.

- **In person:** any MCP staff member at our base, or our community liaison officers in the barangays where we work
- **Phone or WhatsApp:** +63 969 484 7382
- **Email:** team@mcp.email
- **Concerns about our management:** magnus@mcp.email
- **Online:** the contact form at marineconservationphilippines.org/contact/
- **Letter:** Marine Conservation Philippines, Siit Arboretum, Barangay Lutoban, 6218 Zamboanguita, Negros Oriental. Letters do not need to be signed.

Anyone can also go straight to the authorities at any time: the 1343 Actionline Against Human Trafficking on (02) 1343, the police, or the Department of Labor and Employment (DOLE).

10. How We Respond

We log and answer every concern within 30 days under our Grievance Mechanism, putting the safety of the people affected first.

- **A possible crime:** we report it to the police or the 1343 Actionline, and support the authorities' investigation.
- **A staff member breaching this policy:** we take disciplinary action, up to dismissal.
- **A supplier or contractor breaching it:** we work with them to put it right where that helps the workers affected, for example by making sure unpaid wages are paid. If they will not, we end the relationship.

11. Responsibilities and Review

- **Board of Directors:** approves this policy and any changes to it.
- **Directors:** oversee how it is applied, and review any serious concern.
- **General Managers:** put it into practice day to day in hiring, contracts and purchasing, and make sure new staff learn about the policy and how to raise a concern when they join.
- **Everyone this policy covers:** follows it, and speaks up about anything that seems wrong.

This policy works alongside our Child Protection Policy, our Safeguarding and Anti-Harassment Policy and our Grievance Mechanism. We review it every two years, or sooner following a serious concern or a change in the law.

Version 1.0, approved by the Board of Directors in October 2026.