



MALTA EMPLOYERS' ASSOCIATION

POSITION PAPER ON ILLEGAL AND ATYPICAL EMPLOYMENT PRACTICES



 **MEEA**
MALTA EMPLOYERS' ASSOCIATION

1. Introduction

The labour market in many countries is passing through fast transformation, with many countries also having unprecedented unemployment levels, especially among youths. The global economy is experiencing a 'three speed recovery', with many emerging and developing economies reaching pre-recession levels of employment and passing through rising GDP growth. Economies like the United States are also slowly recovering, but the European Union in general – the Eurozone in particular – is still facing stagnation, high unemployment and bleak prospects of recovery.

Over the past decade, there has been mounting pressure to address the changes in work organisation and types of flexible work contracts. The increasing incidence of atypical employment and non-standard contracts raised the concern of unions world-wide, with claims of a two tier labour market, whereby there are those working in indefinite, full time employment in contrast to others working in part-time, indefinite period contract or casual basis. This concern is summed up by Guy Rider in the Director General's report for this year's ILO conference where he states, in reference to employment relationships, that: 'the supposedly atypical has become typical; the standard has become the exception'. In addition, in many parts of the world most workers are still employed in the unregulated, informal economy without access to legal protection and social security.

These concerns have been echoed in Malta as well, as our labour market is adjusting to the requirements of production systems and competitiveness combined with the necessity to accommodate demands for flexible working systems as an active labour market policy measure, given that our labour participation rate lags behind that of many EU economies. It is no coincidence, for example, that the increase in part time employment runs parallel with an increase in female participation and more retired persons in employment.

There has also been a rapid expansion in outsourced services, mainly in response to:

- Inflated rates of pay for certain grades covered by collective agreements
- Inefficiencies in the provision of these services by full-time employees, particularly in government entities
- The need for a specialised service in some areas

The increase in the immigrant population and foreign workers has created situations of unregulated pockets of labour market activity, as immigrants without a working permit offer their services through informal

work arrangements which may, although not necessarily, be exploitative. In many instances, such as in the domestic housework sector, informal work practices are freely entered and negotiated between the parties involved.

Some unions have been raising alarm bells about numerous working practices, both legal and illegal, labelling them under an umbrella heading of 'precarious employment'. The unions' complaints focus mostly, but not exclusively, on outsourced services in security, cleaning and care working sectors.

This paper takes an evidence based approach into the claims of precarious work and proposes tangible actions by the social partners to address, where necessary, issues of irregular or unregulated labour market practices.

2. The Many Faces of Precarious Employment

One of the major hurdles in engaging with unions about the matter of precarious employment is the lack of an accepted definition. Neither the ILO, nor the EU Commission has a definition for precarious work. Consequently, the term has become a chameleon which can adapt its colours to suit particular circumstances. The following is a list of issues, amongst others, that have all been bundled under the term 'precarious':

- Part time employment/ reduced hours
- Definite period contracts
- Self-employment
- Employment in black economy/undeclared work
- Extra hours given on a self-employed contract
- Overtime paid at flat rate
- Minimum wage jobs
- Temping work
- Poor working conditions: e.g. obnoxious work
- Lack of health and safety systems and equipment
- Non-unionised work places
- Workers have to pay for own uniforms
- Workers paid at less than minimum wage
- Kick backs (part of earnings refunded in cash to employers)
- Collusion with single mothers for reduced pay and benefit fraud
- Workload of employees split between different companies having the same owner
- Etc.

The above list can be categorised under three general headings:

- Atypical Employment
- Illegal Practices
- Unethical work practices

These are discussed in the subsequent sections of this paper.

3. Atypical Employment in Malta

Atypical work means work which does not conform to the standard full-time, 40 hour a week, indefinite period contract employment relationship. These generally take the form of part-time, definite period or temping work.

The Association’s position is that atypical employment can never be associated with precarious work. Part-time employment, definite period contracts, even temping work are regulated by legislation, and offer labour market flexibility which is of benefit to employees and employers alike. However, it is worth looking at comparative statistics if one is to take the incidence of such work contracts as a measure or indication of ‘precarious work’.

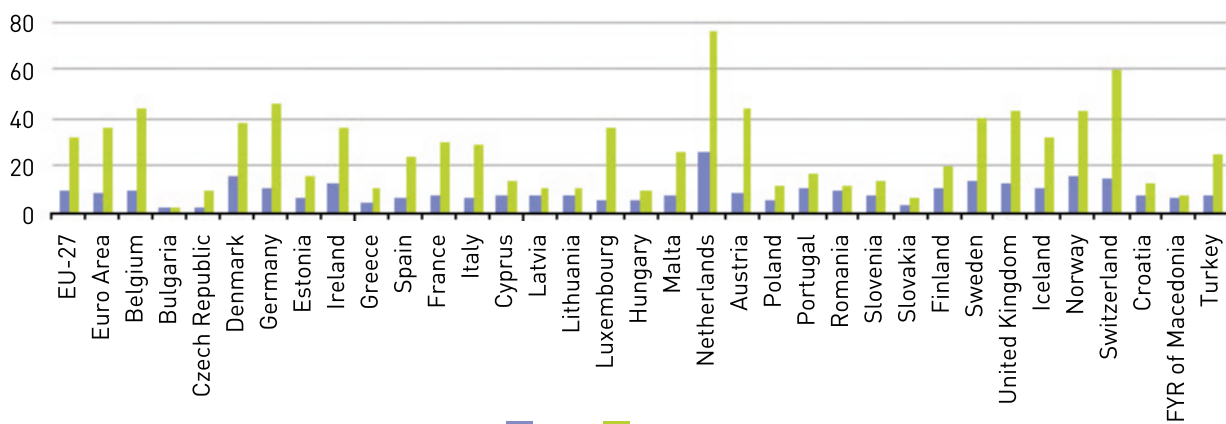
3.1. Part time work in Malta

The percentage of persons employed on a part-time basis in Malta (2012 figures) is currently at 14% of total employment. In the Euro area, the figure stands at 21.6%, while the average of the EU 27 stands at 20%. Therefore the rate of persons on part-time employment in Malta is lower than the EU average.

The data in table 1 shows Eurostat figures for part time employment in different EU economies, and Malta clearly ranks among the countries with a lower incidence of part time employment. It is worth noting that the general pattern is that more females work part-time across the EU, and this indicates that many do so voluntarily as a family friendly measure.

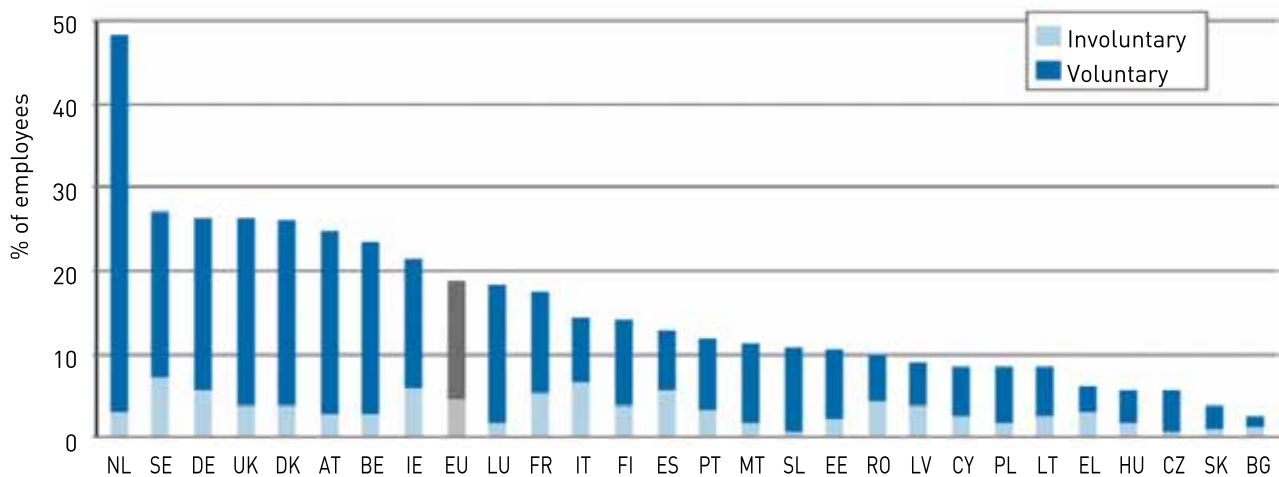
In Malta, there has been a steady increase in the percentage of part-time employment over the last decade. The figure of persons on part-time in 2001 was 7%, but the increase in part-time employment

Table 1: Part-time work in the EU



Source: Eurostat (online data code: tps00159) Male Female

Table 2: Part-time work in the EU



Source: Eurostat, EU LFS

is taking place concurrently with a rapid rise in female participation. . Another fact that emerges from the data is that countries which boast of flexible work organisation to accommodate family friendly measures, and which have a high rate of female participation, also have a high incidence of females on part-time employment.

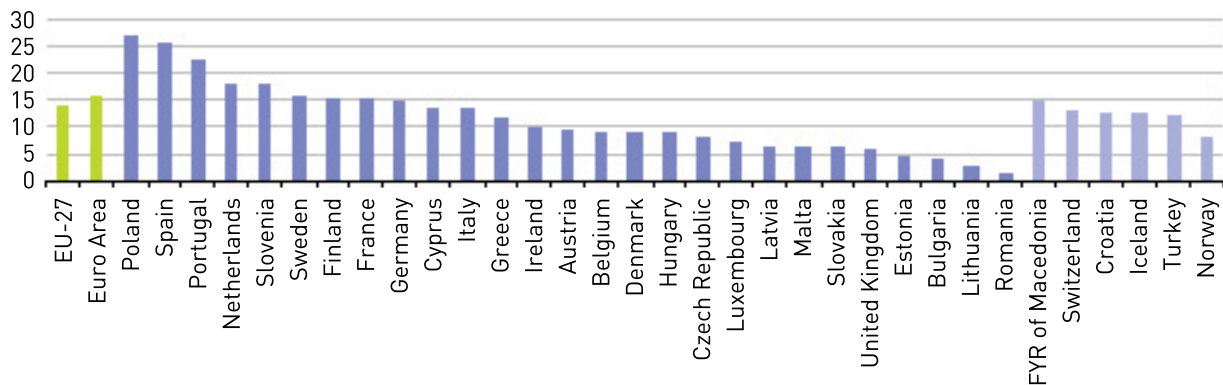
Eurostat data also reveals that in Malta, unlike other countries like Spain, the vast majority of those in part-time employment work part-time out of choice (Fig.2, 2009 figures). Therefore there is little evidence to support the argument that part-time employment is in any way precarious.

3.2. Definite period employment in Malta

Figure 3 provides percentage figures of persons on definite period contracts in the EU. At 6%, Malta has among the lowest incidences of definite period contract employment in the EU. If there was really widespread abuse of definite period contracts by employers, as is at times alleged, the figure would certainly be much higher. Poland and Spain, for example, both have more than 25% of their work-force on definite period contracts.

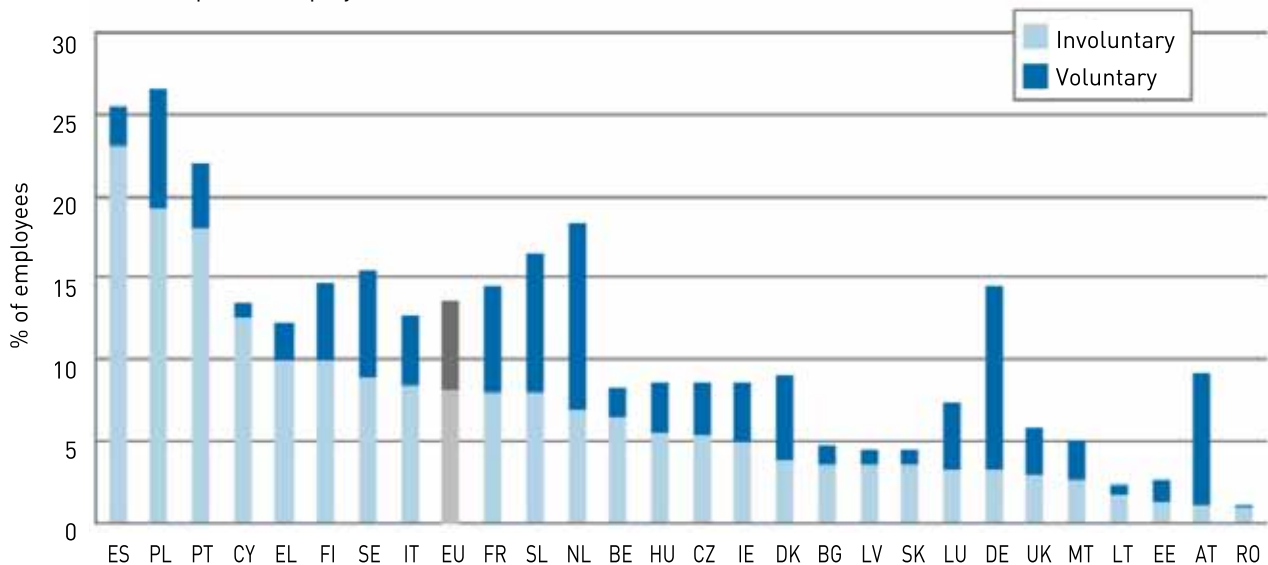
Moreover, the data in Fig. 4 demonstrates that about half of those working on a definite period contract in Malta do so voluntarily. This is also in sharp contrast to countries, like Spain, Poland

Table 3: Definite period employment in the EU



Source: Eurostat (online daya code: ifs_a_etpga)

Table 4: Definite period employment in the EU



Source: Eurostat, EU LFS

and Portugal who not only have a high incidence of people working on a definite period contract, but the vast majority of these are not on a definite period employment by choice.

The outcome here is that, even if one were to consider the notion that part time employment and definite period work may be considered as being precarious, there is a lower incidence of persons employed with such contracts in Malta than the EU

average. This is neither a positive nor a negative sign in itself and one can project that, given the international economic uncertainty and the exigencies of particular segments of the labour force, such as working married women, the percentage of the labour force employed on such contracts will increase in Malta in the near future. As long as these contracts respect the parameters set by legislation, there is nothing precarious in them.

Table 5: Self employment in the EU

	Number of self-employed persons (1000)			Status (%)		Total
	Total	Men	Women	with employees	without employees	
EU-27	32 750	22 700	10 050	28.9	71.1	15.1
EA-17	21 281	14 786	6 495	33.5	66.5	15.0
BE	595	418	177	31.3	68.7	13.2
BG	330	214	116	32.8	67.2	11.2
CZ	858	606	251	20.5	79.5	17.5
DK	239	174	65	41.1	58.9	8.9
DE	4 404	3 009	1 395	42.9	57.1	11.1
EE	50	35	15	46.3	53.7	8.2
IE	292	234	57	30.6	69.4	16.1
EL	1 269	889	380	25.1	74.9	31.0
ES	2 853	1 936	918	33.0	67.0	15.8
FR	2 862	2 013	850	40.1	59.9	11.1
IT	5 366	3 869	1 497	28.3	71.7	23.4
CY	62	45	17	28.8	71.2	16.5
LV	100	60	40	35.5	64.5	10.3
LT	125	74	51	25.9	74.1	9.1
LU	18	12	7	32.7	67.3	8.1
HU	443	305	138	45.4	54.6	11.6
MT	23	19	4	31.6	68.5	13.5
NL	1 203	797	406	26.5	73.5	14.4
AT	483	311	172	41.7	58.3	11.6
PL	3 052	2 009	1 043	22.1	77.9	18.9
PT	992	626	366	25.0	75.0	20.5
RO	1 842	1 289	535	5.8	94.2	20.0
SI	118	83	35	28.6	71.4	12.6
SK	372	272	100	31.7	68.3	12.9
FI	319	218	101	31.7	68.3	12.9
SE	476	349	127	36.5	36.5	10.3
UK	4 023	2 834	1 189	18.2	81.8	13.8
IS	21	14	7	33.5	66.5	12.4
NO	174	127	47	26.7	73.3	6.9
CH	579	373	206	45.1	54.9	13.3
HR	292	181	111	23.9	76.1	19.6
MK	120	96	24	30.5	69.5	18.6
TR	5 929	5 028	902	21.0	79.0	24.6

3.3. Self-employment in Malta

Employers have frequently been faced with accusations of disguised self-employment in Malta, which has led to the introduction of Legal Notice 144 to regulate incidences of improper practices in this regard.

Even if one were to accept the view that a high proportion of self-employed persons is an indicator of abuse - which it isn't - comparative figures (Table 5) reveal that, at 13%, the percentage of self-employed persons in Malta is lower than the EU average. This is not necessarily a positive sign for the economy as it could indicate a reluctance of people to engage in entrepreneurship which is the source of economic growth and job creation.

3.4. Temping Work

Temping agencies play an important role in enhancing labour market flexibility and in enabling companies to be in a better position to fill in temporary gaps in their HR requirements due to volatile demand or due to requests for extended absence by employees because of sickness or family related reasons. The three way nature of the employment relationship involved in the engagement of temping employees raises many issues which are as yet unresolved even at EU level. Yet in Malta, temping agencies should be encouraged to set up shop if employers are expected to be more open to flexi-time arrangements, and other family friendly measures.

Although most temping agencies in Malta offer secretarial services, these are being extended to other types of employment. This trend should be supported. As with part-time and definite period contracts, temping work is a type of atypical employment which cannot be labelled as being precarious.

3.5. Involuntary Atypical Employment

In spite of the analysis, one cannot exclude the reality that there are persons who are on atypical employment involuntarily. The transition from involuntary atypical work to a more standard type of employment relationship, when required, will depend on the job creation potential of the economy. A strong and competitive economy will create jobs which offer opportunities for mobility from part-time and definite period employment to full-time, indefinite period contract jobs. In many cases, atypical employment, even if involuntary, acts as a stepping stone to unemployed persons or to job returners from which

to move to more stable employment. For example, it is common for temping employees to be offered permanent employment in companies where they are assigned. The solution to involuntary atypical employment is not restrictive legislation. Increased legislation may, in effect, work against their interests of job seekers.

4. Illegal Employment Practices

Illegality in an employment relationship cannot be condoned, whether it is caused by workers or by employers. If, within the loosely defined parameters of precarious employment, there are practices which are in contravention of existing legislation, then the logical response to that is enforcement, not legislation.

5. Unethical Work Practices

There may be practices that may occur within existing legal parameters but attempt to stretch the borderline between legality and unethical behaviour. What needs to be understood is that, irrespective where the line of legality is drawn, there can always be those who operate as close to the limits as possible. For example, a company may pay minimum wages because it cannot legally pay less, and is not obliged to pay more. If one argues that paying the minimum wage is unethical and borderline legal, changing the minimum wage does not provide a solution, as there will always be those who pay the minimum, whatever it is. The same applies in other aspects of employment, for example the use of fixed term contracts.

In a way, this is akin to situation is where employers are faced with an employee or group of employees who stick to the minimum productivity levels that they can get away with, in the knowledge that they cannot be liable to disciplinary action.

This is perhaps where the claims of precariousness made by unions carry the most weight, and where the authorities are faced with the highest provocation to legislate. Yet this is also where the same unions can be most effective in raising employees' conditions of employment beyond the lawful boundaries through collective bargaining. On their part, employer bodies must exercise their influence to promote 'fair' practices. Ultimately, the best solution to these circumstances is labour mobility. Employers with a bad reputation invariably face the substantial cost of a high turnover, low productivity due to demotivation and poor retention of good employees.

6. Tackling Precarious issues

The above raises the question as to which issues may be sifted as being distinctly precarious, if one wants to arrive at a definition and propose solutions.

The General Workers' Union has conducted a research exercise about precarious work (Appendix 1) and one of the questions contains a list of practices which the union is deeming to be precarious.

The following section takes this list and identifies sections in existing Maltese legislation which, partially or wholly, address these practices.

6.1. Hourly/weekly rate is less than National Minimum

The minimum wages are established by the Wage Council Wage Regulation Orders. In the absence of a WRO the National Minimum Standard Wage established by the National Standard Orders applies.

Any employer who contravenes or fails to comply with any recognised conditions of employment prescribed by a national standard order or by a sectoral regulation order or collective agreement, or with any provisions of the EIRA or any regulations made thereunder shall, unless a different penalty is established for such offence, on conviction be liable to a fine (multa) which may be converted into imprisonment of not less than two hundred and thirty-two euro and ninety-four cents (232.94) and not exceeding two thousand and three hundred and twenty-nine euro and thirty-seven cents (2,329.37).

6.2. Fixed Term Employment

Article 4 of the fixed term regulations stipulates that employees on a contract of service for a fixed term shall not be treated in a less favourable manner than comparable permanent employees solely because they have a contract of service for a fixed term. A contract of service for a fixed-term shall be transformed into a contract of service for an indefinite period if:

- (a) the employee has been continuously employed under such a contract for a fixed term, or under that contract taken in conjunction with a previous contract or contracts of service for a fixed term in excess of a period of continuous employment of four years; and
- (b) the employer cannot provide objective reasons to justify the limitation of a renewal of such a contract for a fixed term.

The law does not stipulate a minimum term for a definite period, nor set a number of renewals before a person on an indefinite period contract becomes an indefinite period contract employee. However, one must bear in line the borderlines mentioned in section 5. Changing the borderline can create a new class of employees which the unions will term as being on precarious employment.

6.3. Forced Part Time or Reduced Hours

Article 2 of the Employment and Industrial Relations Act defines both a part-time employee as well as a whole timer with reduced hours. A part timer means an employee whose normal hours of work, calculated on a weekly basis or on an average over a period of employment of up to one year, are less than the normal hours of work of a comparable whole-time employee and who is not a whole-time employee with reduced hours. A whole time with reduced hours stipulates that "whole-time employee with reduced hours" means a whole-time employee who in agreement with the employer works for less than the number of hours of work applicable in terms of the recognised conditions of employment to a whole-time employee, provided that such employment is the principal employment of the employee, in respect of which social security contributions are payable.

As mentioned previously, most employees who work part time or on reduced hours do so voluntarily.

6.4. False Self-Employment

By means of Legal Notice 44 of 2012 individuals who satisfy five out of the eight criteria established in the Legal Notice are automatically considered to be employees who enjoy all benefits and entitlements pro rata the number of hours that they work. Therefore this applies to both individuals working on a full and part time basis. Individuals who would prefer to continue enjoying the status of self-employed have to request the Director of Industrial and Employment Relations for a derogation.

6.5. False Payslips

Although there is no legal obligation for employers to give payslips, under-declaring income is a type of fraud which is a criminal offense and punishable by law. It is also manifestly illegal if an employee is forced to return part of the income which is shown on a payslip to the employer.

6.6. Inexistence of Social Benefits and no pay for Overtime Hours

This is dealt with exhaustively in Article 45 of the EIRA. It stipulates that any employer who contravenes or fails to comply with any recognised conditions of employment prescribed by a national standard order or by a sectoral regulation order or collective agreement, or with any provisions of this Act or any regulations made thereunder shall, unless a different penalty is established for such offence, on conviction be liable to a fine (multa) which may be converted into imprisonment of not less than two hundred and thirty-two euro and ninety-four cents (232.94) and not exceeding two thousand and three hundred and twenty-nine euro and thirty-seven cents (2,329.37).

Where any employer is convicted of:

- (a) having failed to pay wages at not less than the rate applicable in accordance with a recognised condition of employment as defined in Part III of this Act or with a contract of service whichever shall be the higher, or
- (b) having made any illegal deduction or inflicted any fine other than those specifically permitted by article 19, or
- (c) having failed to make payment of any bonus payable under article 23, or any other payment due by an employer to any employee under this Act or under any order made thereunder, or
- (d) having withheld any remuneration or any payment in lieu of notice, or
- (e) having failed to allow paid holidays as provided for or specified in any national standard order, sectoral regulation order or contract of service, or
- (f) having failed to effect payment of any moneys due to an employee under this Act or under any national standard order or sectoral regulation order or any other order made under this Act,

the court shall, at the request of the prosecution, besides awarding the punishment imposed by the preceding subarticles of this article, order the offender, on proof of the amount, to refund or pay to the employee or employees concerned, or to the apprentice or apprentices concerned, as the case may be, the said amount due by him and, in the case of holidays with pay not allowed, a sum equal to the pay thereof, and any such order by the court shall be of the same force and effect and be executable in the same manner as if it had been given in a civil action duly instituted between the employee or employees

concerned or the apprentice or apprentices concerned, as the case may be, and the employer:

Provided that nothing in this subarticle shall derogate from any right of the employee or apprentice, as the case may be, to recover by any other means any amount due to him.

Article 24 of the Criminal Code, which states that in the case of any contravention committed by a person who is under the authority, control or charge of another person, not only the person committing the contravention but also such other person shall be liable to punishment, if the contravention is against some provision the observance of which such other person was bound to enforce, and if the contravention could have been prevented by the exercise of diligence on the part of such other person, shall apply also to offences committed under the Employment and Industrial Relations Act.

6.7. Lack of Health and Safety

Article 9 of the EIRA states that in so far as conditions of employment are concerned, the provisions of the Occupational Health and Safety Authority Act and any regulations issued thereunder shall be deemed to form part of the recognised conditions of employment of employees to whom such provisions or regulations may apply and shall, on coming into force, have the same effect as if they were national standard orders or sectoral regulation orders.

6.8. No Right to Join a Trade Union

Article 2 of the Employment and Industrial Relations Act describes "discriminatory treatment" as any distinction, exclusion or restriction which is not justifiable in a democratic society including discrimination made on the basis of marital status, pregnancy or potential pregnancy, sex, colour, disability, religious conviction, political opinion or membership in a trade union or in an employers' association;

Article 36 (14) of the EIRA safeguards employees by stating that an employer may not set up as a good and sufficient cause for terminating employment that the employee at the time of the dismissal was a member of a trade union, or is seeking office as, or acting or has acted in the capacity of an employees' representative;

The EIRA stipulates clearly when and who may be lawfully restricted from joining a trade union.

This section amply demonstrates that the existing legal framework already provides sufficient protection against the types of abusive or 'precarious' employment practices as listed by the unions - in this case the GWU - themselves.



7. MEA's Recommendations

The points and issues raised above call for focused interventions by all the social partners to minimise the negative impact which some practices are leaving on employees and also companies in the private sectors.

7.1. Recommendations to Government

Government should:

- Set a minimum hourly rate for labour intensive outsourced services. Tendering companies will not be allowed to bid below this rate. This measure will be instrumental – but not entirely sufficient – to ensure that service providers can offer at least minimum legal working conditions to their employees.
- Intensify its inspectorate to see that existing labour legislation is respected and enforced.
- Target enforcement efforts on those companies who operate on the borderline between legal requirements and ethical obligations, rather than adopting a shotgun approach on all employers in all sectors. This will make limited resources more effective in identifying and combatting abuse.
- Endorse the Service Charter (appendix 2) being proposed by the Malta Employers' Association as a self-regulating instrument that encourages compliance with labour legislation, and which rewards companies which commit themselves to abide by ethical principles in employment through a positive weighting in awarding tenders. The Service Charter will in itself act as a safeguard to guarantee lawful working conditions if companies in these sectors benefit from the increased hourly rate as mentioned above.

- Engage with employer bodies and unions through social dialogue to identify and tackle issues in a constructive and proactive manner.

7.2. Recommendations to unions

Unions should:

- Be vigilant and report any illegalities reported by their members to the appropriate authorities
- Respect the right of association, and equally that of disassociation. Members should be free to join a trade union of their choice and to leave a union without any coercion from unions or management.
- Endorse the Services Charter being proposed by the Employers' Association to promote ethical employment practices

MEA is not in favour of the idea of awarding tenders only to unionised companies.

7.3. Employers

Employers should:

- Through their representative associations, educate employers about their legal rights and obligations and promote ethical work practices
- Administer, in conjunction with the other social partners, the Services Charter

By placing aside preconceptions, adopting an evidence-based and objective driven approach, and working in tandem, the social partners can face the labour market issues which are addressed in this report.

APPENDIX 1

FIGHTING PRECARIOUS EMPLOYMENT – EMPLOYERS' ASSOCIATIONS

1. Do you think precarious employment is an issue in Malta? Yes No
2. Have you ever had complaints about precarious employment? Often Sometimes Never

If you answered YES for question number 2, kindly continue by answering the following questions:

3. Which is the most common gender that complaint about precarious employment? Males Females

4. Which age group is the most common in precarious employment complaints?

16-25 26-35 36-45 46-55 56+

5. What was the most common marital status of those who reported? (tick one)

Single Single parent Married/Cohabiting Married/Cohabiting with children Widow/Widower

6. What type of precarious employment is normally reported? (tick as appropriate)

- Hourly rate or weekly wage which is lower than the national minimum wage
- Fixed term employment e.g. 3 month contracts with the possibility of renewal
- Forced part-time or reduced hours (when the real contract/agreement states that the employment shall be full-time i.e. 40 hours per week)
- False self-employment (Bogus self-employment) – so as the employer would save from employment related benefits i.e. bonuses, vacation and sick leave, increments.
- False payslips – with the verbal agreement between employee and employer to return part of the pay cheque in cash to the employer
- Inexistence of social benefits like vacation leave, sick leave, quarterly bonuses and government increments
- Lack of Health and Safety measures
- No appropriate pay for overtime hours
- No right to join a trade union to represent you

Other (please specify) _____

8. What kind of actions do you take when precarious employment issues are raised? _____

9. What measures do you suggest, should be implemented to reduce precarious employment? _____

APPENDIX 2

Service Charter for Companies operating in the Security, Cleaning and Care Working Sectors

1. Objective

The objective of this Charter is to create an environment where operators in the Security, Cleaning and Care Working sectors:

- operate in a competitive environment that offers a level playing field to all operators
- align their operations and strategies in a manner that respects the legal obligations of employment legislation in Malta,
- respect ethical principles mentioned in this Charter in their role as employers

2. Principles

- 2.1. All employees on part time employment shall be given pro rata benefits as provided by legislation
- 2.2. Companies shall not engage persons on contracts for service (self employed contracts) for work which is permanent and which is under the direct supervision and control of the company
- 2.3. Signatory companies will not distribute the hours of work of their employees on different companies for the same work carried out at the same workplace
- 2.4. Any hours worked in excess of 40 hours per week will be paid at overtime rates
- 2.5. The Company shall pay for the provision of uniforms, cleaning materials, and transport costs incurred during the execution of the employee's duties
- 2.6. All signatories of the Charter will:
 - Recognise that the concept of fair competition shall not be restricted to economic activity but shall also extend to the labour market;
 - Recognise that the economic concerns of the employer and the dignity of the employees should be complimentary;
 - Respect the rights of employees in the exercise of the members' rights in Employee relations;
- 2.7. Not discriminate among employees and prospective employees on grounds of politics, , religion, creed, disability, civil status, gender or race.
- 2.8. No employee shall be obstructed from joining a trade union or penalised in any way if he becomes a union member

3. Governance

- 3.1. All companies operating in the sectors covered by this Charter may opt to become signatories of the Charter
- 3.2. Signatory companies may opt to withdraw their support of the Charter by writing to the Malta Employers' Association
- 3.3. The Charter shall be governed by a Regulatory Committee. The composition of this regulatory committee shall be:
 - A Chairperson who is also a member of the Council of the Malta Employers' Association
 - Two members appointed from employers not involved in the sectors governed by this Charter
 - A member nominated by Trade Unions
 - A member appointed by Government
 - Each member may serve on the Committee for a period of not more than three consecutive years
- 3.4. The Regulatory Committee will:
 - Ensure that signatory companies will abide by the provisions of the Charter
 - Organise hearings to investigate claims that signatories are not abiding by the provisions of the Charter
 - Forward complaints by companies who lose business to other companies, both signatory or non-signatory to the competent authorities
- 3.5. Signatories who are found to be in breach of the provisions of the Charter will be given a time frame to rectify their situation
- 3.6. If the Signatory Company fails to abide by the provision of clause 3.5, the regulating committee may remove the company from the list of signatories of the Charter
- 3.7. The removal of a company as a signatory will be made known to members of the Malta Employers' Association
- 3.8. Public entities and companies in the private sector will assign a weighting to signatories of this Charter in the awarding of tenders



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