



Modern Slavery Policy

Prepared by		Board Signature
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Scope

This policy applies to all employees of Apprentify Group Limited (the Organisation) and all its subsidiaries, regardless of seniority or site.

Any reference to Apprentify Group Limited in this policy also includes all subsidiary companies.

Definition

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of SaaS, outsourced staff and office supplies. We ensure that these first-tier suppliers in turn have their own supplier, and we seek assurance that these supply chains are, in turn, free from slavery.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist within its overseas associates, as oversight of operations is naturally less visible.

In general, the Organisation considers its exposure to slavery and/or human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to It.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- measures in place to identify and assess the potential risks in its supply chains, Including checking safer recruitment compliance within suppliers where necessary
- having a clear zero-tolerance policy towards modern slavery.

Governance and Ownership

The HR Director has overall responsibility for this policy. Day-to-day responsibility for implementation and supplier due diligence sits with relevant operational and procurement leads. The Board retains oversight of modern slavery risks.

Reporting Concerns

All individuals are encouraged to report concerns relating to modern slavery. Reports can be made via line management, HR or confidential channels in line with the Whistleblowing Policy. All concerns will be handled appropriately and without retaliation.

Escalation

Where concerns are identified, the Organisation will take appropriate action, which may include investigation, engagement with the supplier, implementation of corrective actions or termination of the relationship.

Policies

The Organisation has the following policies which further define its stance on modern slavery:

- Corporate Social Responsibility Policy
- Safer Recruitment Policy
- Subcontracting Policy
- Safeguarding Policy

Review

This policy will be reviewed at least annually.