

Modern Slavery & Human Trafficking Policy

SEP Educational Services is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

As such, the company strives to improving our practices to combat slavery and human trafficking and fulfil our obligation to Section 54 (1) of the Modern Slavery Act 2015.

The purpose of a Modern Slavery & Human Trafficking Policy is to demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Overview

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- i. We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- ii. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- iii. We are committed to engaging with our suppliers to address the risk of modern slavery in our operations and supply chain.
- iv. We take a risk-based approach to our contracting processes. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- v. Consistent with our risk-based approach we may require:
 - a. employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - b. Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code

- vi. As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- vii. If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships, with possible escalation by reporting to the appropriate authorities.

Identifying Modern Slavery

Modern slavery may be found in:

- a. our business, for example our cleaning and catering workforce;
- b. our supply chains;
- c. outsourced activities, particularly to jurisdictions that may not have adequate modern slavery safeguards.

There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:

- a. The person is not in possession of their own passport, identification or travel documents.
- b. The person is acting as though they are being instructed or coached by someone else.
- c. The person allows others to speak for them when spoken to directly.
- d. The person is dropped off and collected from work.
- e. The person is withdrawn or appears frightened.
- f. The person does not seem to be able to contact friends or family freely.
- g. The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking

Responsibility for this Policy and compliance

The Directors have overall responsibility for ensuring this policy complies with the company's legal and ethical obligations.

All SEP employees, including subcontractors, consultants, temporary workers and volunteers must comply with this policy.

All suppliers and partners must comply with this policy.

Reporting Modern Slavery

All staff and suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:

- i. If you are a member of staff, your Manager; or
- ii. If you are a supplier or partner, your primary business contact at SEP

Breach of Policy

Any staff member who breaches this policy may face disciplinary action, which may result in dismissal for misconduct or gross misconduct

SEP may terminate its relationship with a supplier if it is in breach of this policy. Alternatively, we may elect to work with the supplier to resolve such issues.