



EXPLORE LEARNING LTD

MODERN SLAVERY POLICY

Introduction and statement from the People Director

Explore Learning Ltd takes its responsibilities very seriously with regard to the Modern Slavery Act 2015. This statement sets out the approach taken by the company to understand all potential modern slavery risks related to its business and the actions undertaken to mitigate any such risks.

Organisation structure

Explore Learning is one of the leading maths and English tuition providers in the UK and operates in over 140 centres in the UK. Explore Learning's head office is in the UK and all of its trading premises are in the UK and employs over 3500 employees.

Explore Learning Ltd. statement on slavery and human trafficking

Explore Learning Ltd has a zero-tolerance approach to any form of mistreatment of people and is committed to operating and conducting its business in such a way that human rights are respected and protected. We will not permit or condone any form of slavery, servitude, forced or compulsory labour or human trafficking. We recognise that our business has a role to play in managing this issue and we are firmly committed to working to identify and eradicate modern slavery practices from our operations and our supply chains, to the extent that they exist.

Explore Learning operates in the UK and employs over 400 salaried employees and over 3200 variable hours employees. All staff must read our full Policies and Procedures on an annual basis and answer a set of questions to check for understanding. The key policies that support this Modern Slavery policy are:

- Whistleblowing policy
- Recruitment policy
- Code of conduct

As part of our ongoing commitment to eradicating modern slavery from all aspects of our business and supply chains, we have identified the key areas that pose the highest risk. We have identified these areas through a process of risk mapping. The below areas are not exclusively the only areas of risk, however they pose the highest risk due to the volume and nature of the areas. These are:

- The recruitment of staff
- The purchase of goods that Explore Learning offer to its members as part of the Reward and Recognition scheme

Responding to these risks

Recruitment

We operate a robust recruitment and employment process. We embrace principles supportive of equal treatment without discrimination and with the protection of employment law for all staff. We treat all staff equally, without discrimination and with respect for their human rights.

All staff enjoy the protection of relevant UK law in respect of their employment. Whilst in the main Explore Learning Ltd runs its recruitment process internally, where we use external partners we select approved recruitment partners. Approved partners are reviewed on a regular basis. Explore Learning is legally required to undertake certain basic documentation checks on every potential employee to avoid employing illegal workers. This policy applies to all new employees of the Company, irrespective of their national origin. Before any individual of any nationality starts work for the Company, it is obligatory that he or she can prove entitlement to work in the UK.

Document checks

To ensure that all employees are eligible to work in the UK, Explore Learning will ensure that for all new staff, the following must be done:

- The new staff member must show proof of eligibility to work in the UK with original documents
- The original documents that prove eligibility must be checked with the new staff member present
- Copies of the documents will be held within the staff member's staff file
- The date the check was made will be recorded on the front of the staff members staff file
- Any documents that have an expiry date will be rechecked on those dates as required

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. Senior managers are responsible for compliance in their respective areas and departments and for their supplier relationships in relation to the monitoring and enforcement of our internal policies and values.

Purchasing of goods for member reward/recognition

Our supply chains include over 40 suppliers and in excess of 10 contractors covering all aspects of building maintenance to technology suppliers. We encourage our suppliers to endorse such principles to demonstrate their opposition to human trafficking and modern slavery. Our current supplier mapping and an ongoing process to create a Procurement policy will enable us to further support our efforts to eradicate any modern slavery issues within our supply chains. We have communicated with our top three suppliers, and have obtained their modern day slavery policies to ensure that their internal processes are meeting the high standards that we expect.

Where a supplier fails to meet their own policy and our own high standards, we request a full response to the reasons for the failing, and if not suitable or future failings happen, terminating contract is the final option.

Due diligence processes for slavery and human trafficking

We have in place a policy to protect whistle blowers who highlight to us any risk of slavery or human trafficking within our business.

We understand that our responsibility to eradicate any form of modern slavery in our business and supply chains is an ongoing process. We will continue to review all aspects of this policy and publish an updated version on an annual basis. All employees are required to read our full policy document on an annual basis and answer questions relating to the policies to ensure all employees understand their role.

Catriona Scott

People Director

28th March 2019