

Modern Slavery Policy

Policy date: September 2025

Renew date September 2026

1. Overview and how we define Modern Slavery

1.1 Slavery, child labour and human trafficking are serious crimes and a violation of fundamental human rights. There are various forms of this 'Modern Slavery' which deprives victims of their liberty and usually involves financial exploitation.

1.2 At Smart Education we conduct our business fairly, ethically and with respect to fundamental human rights. We are fully committed to the prevention of all forms of slavery, forced labour or servitude, child labour and human-trafficking, both in our business and in our supply chains. We will not tolerate it.

1.3 This policy does not form part of your contract of employment, and we reserve the right to amend this policy at any time.

1.4 You are required to read and comply with this policy if you work for, or on behalf of the Company in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.

1.5 The Company's Anti-Slavery Officer [Fiona Moss] ('ASO') is responsible for this policy.

1.6 Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and the Company. It could also involve other legal steps being taken against you.

2. Preventing slavery and human-trafficking in our business

2.1 The Company makes appropriate checks on all employees, recruitment agencies and suppliers, to know who is working for, or on behalf of us.

2.2 The Company provides every employee with a written contract of employment. We pay every employee in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

[2.3 All employees are required to sign a copy of this policy to show they have read and understood it.] [All managers are provided with training on this policy.]

3. If you are one of our Suppliers

3.1 If you supply the Company with goods or services, you must assess your business and supply chains and confirm to our ASO that you comply with your legal obligations, in relation to Modern Slavery, and are committed to ensuring there is no slavery, forced labour or servitude, child labour or human trafficking taking place in your business, or any of your supply chains. [You must also provide a copy of your anti-slavery policy.]

3.2 If you breach this policy, or are found to have slavery or human-trafficking in your business, or knowingly in your supply chain, the Company may terminate the contract with you and pursue its legal remedies against you.

4. If you are an Employee or Worker providing services for us

4.1 You must immediately report any suspicions of Modern Slavery or human-trafficking in our business or supply chains to our ASO. Our ASO will investigate and report to our [Board of Directors], within a reasonable time, on actions which may require to be taken.

4.2 You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately inform our ASO and if you are an employee, refer to our Grievance and Whistleblowing Policies.