

MANTRA LEARNING

MODERN SLAVERY POLICY

1.0 INTRODUCTION/PURPOSE

1.1 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

1.1.1 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 under the Modern Slavery Act 2015 and a violation of fundamental human rights.

1.2 Mantra Learning takes appropriate steps to ensure that everyone who works for the company and/or its subcontractors, benefits from a work environment that respects their fundamental rights and freedom; notably their rights in relation to modern slavery and human trafficking. Mantra Learning is committed to maintaining procedures and practices, and implementing systems and controls, aimed at ensuring that modern slavery is not taking place anywhere within our organisation and does not affect any of our staff or learners.

1.3 Whilst we consider our exposure to modern slavery to be very limited in our market sector, we expect our suppliers and subcontractors to demonstrate a zero-tolerance approach to exploitation. We expect that our subcontractors and suppliers will hold their own suppliers to the same high standards.

2.0 POLICY STATEMENT

In order to achieve the objectives described above, Mantra Learning commits to the statements below.

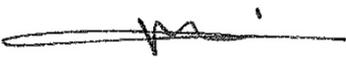
- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. This includes educating our staff, the staff of our subcontractors, and our learners; about modern slavery.
- We take a risk based approach to our contracting processes and keep them under review. 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.

- We require our subcontractors and learners to comply with our Code of Conduct and Behaviour Policy respectively, and also our Safeguarding Policy which dictates the reporting of any and all concerns about another individual.
- Consistent with our risk based approach we may require:
 - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - suppliers engaging workers through a third party to obtain that third party's agreement to adhere to the Code
- 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.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action.

3.0 CONTRAVENTION OF POLICY

Failure to comply with any of the requirements of this policy is a disciplinary offence and may result in disciplinary action being taken under the Mantra Learning disciplinary procedure.

Signed:  .

Mark Currie
Chief Executive

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