

CITY & GUILDS MODERN SLAVERY POLICY

1. INTRODUCTION

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking (“**modern slavery**”), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.2 In this policy, the term “**City & Guilds**” means:

- (a) UK companies which are owned or controlled directly or indirectly by City & Guilds Limited; and
- (b) Companies outside the UK which are owned or controlled directly or indirectly by City & Guilds Limited.

2. APPLICATION

2.1 This policy applies to City & Guilds and to all:

- (a) people working for or on behalf of City & Guilds in any capacity, including all employees, directors, officers, workers, volunteers, interns, apprentices, secondees, and similar (“**Personnel**”); and
- (b) contractors, external consultants, agencies, third-party representatives, business partners, and similar (“**Suppliers**”). Where a Supplier has its own modern slavery policy, we expect the Supplier to adhere to that policy.

3. PURPOSE

3.1 The purpose of this policy is to set out City & Guilds' policy on modern slavery. City & Guilds has a zero-tolerance approach to modern slavery within its business and its supply chains.

4. OUR COMMITMENT

4.1 City & Guilds is committed to:

- (a) acting ethically and with integrity in all our business dealings and relationships;

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- (b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and
- (c) ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.

4.2 City & Guilds specifically prohibits the use of work paid recruitment fees, compulsory overtime, child labour, discrimination, confiscation of identification documents and any act which may directly or indirectly impede freedom of movement, freedom of association, or the freedom of a worker to terminate their employment with City & Guilds.

4.3 City & Guilds requires the same high standards from our Suppliers. Our standard contracts include specific prohibitions against modern slavery and require Suppliers to comply with their own modern slavery policy or City & Guilds' modern slavery policy if they do not have their own policy. We also expect our Suppliers to hold their own suppliers to the same high standards.

4.4 As part of City & Guilds' procurement policy and process, the City & Guilds Procurement team will request a copy of each bidder's modern slavery policy and carry out appropriate due diligence where the procurement is above the minimum threshold of spend as stated in the procurement policy. Where the procurement is below the minimum threshold of spend, the City & Guilds contract manager is responsible for requesting a copy of each bidder's modern slavery policy.

5. IDENTIFYING MODERN SLAVERY

5.1 Modern slavery may be found in our business, our supply chains, and outsourced activities.

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

- (a) The person is not in possession of their own passport, identification or travel documents.
- (b) The person's wages are being paid to a bank account in another name, which may be an indicator of debt bondage or withholding of wages.

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- (c) The person is acting as though they are being instructed or coached by someone else.
- (d) The person is working excessive overtime.
- (e) The person allows others to speak for them when spoken to directly.
- (f) The person is dropped off and collected from work.
- (g) The person is withdrawn or appears frightened.
- (h) The person does not seem to be able to contact friends or family freely.
- (i) The person has limited social interaction or contact with people outside of their immediate environment.
- (j) There are signs of abusive working or living conditions.

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.

6. TRAINING

- 6.1 A training note is available to all Personnel via the City & Guilds Intranet.
- 6.2 Online anti-slavery training module is available to all Personnel on demand via the City & Guilds online training portal.
- 6.3 Face to face or online training is available to all Personnel on request to legaldept@cityandguilds.com

7. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE

- 7.1 The Management Board has overall responsibility for ensuring this policy complies with the City & Guilds' legal and ethical obligations.
- 7.2 The Legal Department, in conjunction with Procurement and the People Function, has primary and responsibility for implementing this policy, and for dealing with any queries about it.
- 7.3 All Personnel must comply with this policy.
- 7.4 Each Supplier must comply with this policy, or its own anti-slavery policy.

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8. REPORTING MODERN SLAVERY

8.1 Personnel and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:

- (a) if you are a member of City & Guilds' Personnel, your Line Manager;
- (b) if you are a Supplier, your primary account manager or business contact;
- (c) if you are a member of City & Guilds Personnel or a Supplier and you wish to remain anonymous, you may email whistleblowing@cityandguilds.com and your report will be dealt with in accordance with the City & Guilds Whistleblowing Policy which is available to Suppliers and Personnel on City & Guilds' website and to Personnel via the City & Guilds intranet.

9. PUBLICATION OF THIS POLICY

9.1 This policy is available to Personnel on via the City & Guilds intranet.

9.2 This policy is available to Suppliers on City & Guilds' website.

10. BREACHES OF THIS POLICY

10.1 Any Personnel who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

10.2 City & Guilds may terminate its relationship with a Supplier if it is in breach this policy or the Supplier's policy. Alternatively, City & Guilds may elect to work with the Supplier to mitigate and resolve such issues where possible.

11. POLICY REVIEW

11.1 The Legal Department, in conjunction with Procurement and the People Function, is responsible for reviewing this policy as necessary, and no less than every 2 years, to ensure that it meets legal and ethical requirements and reflects best practice.

11.2 This policy does not form part of any contract of employment and may be amended at anytime.

11.3 City & Guilds Personnel are invited to provide feedback on this policy and to suggest actions to improve on our anti-slavery measures by emailing feedback to the Legal Department legaldept@cityandguilds.com

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