

Company Name: PENGUIN TRAINING SOLUTIONS Ltd

Date: 31/01/22

Introduction

1.1. Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. 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.

1.2. The Company operates in the training services sector that is a low risk environment where modern slavery is concerned. Although we do purchase training equipment and commission services from third parties such as room hire, hotels and travel.

1.3. The Company strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold themselves and their own suppliers to the same high standards.

2. Policy Statement

2.1. We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

2.1.1. We have a zero-tolerance approach to modern slavery in our organisation or 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.

2.1.2. We are committed to training relevant employees in modern slavery, how to identify it in practice and how to respond.

2.1.3. We are committed to engaging with our direct suppliers where possible to address the risk of modern slavery in our operations and supply chain.

2.1.4. As part of our contracting processes, where we are able to negotiate the terms of supply we negotiate to include a specific prohibition against the use of modern slavery and trafficked labour and an ability to audit the supplier's organisation for compliance with this policy.

2.1.5. Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with this policy.

Anti-Slavery and Human Trafficking (Policy)

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3. Policy Application

3.1. 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, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.

3.2. This policy does not form part of any employee's contract of employment and we may amend it at any time.

3.3. Workers must ensure that they read, understand and comply with this policy.

4. Responsibility for the policy

4.1. The managing director has approved this policy and is committed to making available sufficient resources for its implementation and has overall responsibility for ensuring compliance.

4.2. The managing director through the senior training manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

4.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

5. Reporting Modern Slavery

5.1. Employees must notify their line manager, the senior training manager or the managing director in accordance with the Whistleblowing policy as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy.

5.2. If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify as soon as possible the managing director.

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5.3. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the managing director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

6. Breaches of this policy

6.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.