



# Modern Slavery Statement

<b>Distribution</b>	All Staff		
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## DOCUMENT CONTROL

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1.0	Faye Hand	First Version	14.02.2023
2.0	Beatrix Lopez	Review and transfer to Group Policy template	29.09.2023
2.1	Vicky Marlor	Inclusion of Bepro and ECTA	30.09.2024
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## Policy Statement

For the purpose of clarity, the term "B2W" refers to the family of B2W Group organisations – Back to Work Complete Training, Just IT, BePro and ECTA.

### 1. Policy Statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The B2W Group has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The B2W Group expects the same high standards from all its suppliers, contractors, and other business partners. As part of The B2W Group contracting processes, we include specific prohibitions against the use of modern slavery, and expects that its suppliers will, in turn, hold their own suppliers to the same standards.

This policy applies to all individuals working for the Company or on The B2W Group's behalf in any capacity, including employees, directors, freelance workers, volunteers, contractors, consultants and business partners.

### 2. Responsibility of the policy

The B2W Group's directors have overall responsibility for ensuring that this policy is applied and complies with The B2W Group's legal and ethical obligations.

Luke Muscat, Group CEO for The B2W Group, has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. He is also responsible for investigating allegations of modern slavery in The B2W Group's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

### 3. Compliance

The prevention, detection, and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for The B2W Group or under the Company's control. Everyone is required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Whistleblowing Policy.

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You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of The B2W Group's business or supply chains as soon as possible.

If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager.

You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The B2W Group aims 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

#### **4. Training and Communication**

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to The B2W Group staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The B2W Group's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

#### **5. Breach of the policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The B2W Group may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

#### **6. Modern Slavery Helpline Web Link**

<https://www.modernslaveryhelpline.org/>