

## Modern Slavery Act

1. Captiva Learning Ltd. Is committed to eliminating modern slavery, human trafficking, forced labour, and

similar human rights abuses.

2. Captiva Learning Ltd. is committed to ensuring that its staff and any workers it supplies (directly or

indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.

3. Captiva Learning Ltd. provides appropriate training and awareness information for all of its staff.

In particular:

• All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Director of Captiva Learning Ltd..

5. Reports surrounding these issues are taken extremely seriously by our Board of Directors and the Captiva Learning Ltd. HR Department, who are committed to ensuring that all investigations shall be

prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:

- Working with the appropriate organisations to improve standards,
- Removing that organisation from our preferred supplier list,
- Passing details to appropriate law enforcement bodies.

6. We regularly monitor our risks in this area through the use of relevant key performance

indicators, including:

- The percentage of candidates supplied from audited businesses / our preferred supplier list,
- The effectiveness of enforcement against suppliers who breach policies,
- The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
- The level of modern slavery training and awareness amongst our staff.

7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.

This policy was adopted on February 2016 after being agreed by our Board of Directors and the Captiva Learning Ltd. HR Department. It is reviewed annually.