

## 1 What does this policy cover and who is covered

Modern slavery – commonly called ‘slavery’, ‘child labour’ and/or ‘human-trafficking’ – 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, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. These are heinous activities that we will never engage in or condone as a business, and that we condemn in others who engage in them.

We are committed to upholding the Human Rights Act 1998, which protects the right of all people to be free from slavery and forced labour. We believe that everyone has the right to be treated with dignity and respect, and we are committed to creating a workplace where everyone feels safe and respected.

We have a zero-tolerance approach to modern slavery and will not engage in business of any description with any business who does so. We are committed to transparency in our own business and in our approach to tackling modern slavery in our supply chains, taking account of the Modern Slavery Act 2015 and relevant guidance.

If we discover that any business or individual associated in any way with our business is engaged in, or otherwise supporting, and/or condoning or failing to prevent such activities, when such activities are within their control and/or influence, we will cease all connection with them. We will also consider whether we are under any reporting or other legal duty in respect of this disassociation and our reasons for it.

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, external consultants, third-party representatives, and business partners. Failure to comply with this policy may result in disciplinary action, including dismissal or termination of your contract with Bright Heart Education Ltd (“Bright Heart”). It could also involve other legal steps being taken against you.

If you have any queries about this policy or any concerns about activities that are identified within it, and which may affect our business, please raise them without delay with Simon McQueen, who is our designated anti-slavery officer and responsible for this policy.

## 2 It is not part of your employment contract

This policy is not part of your employment contract. We may amend this policy at any time.

## 3 Prevention of these prohibited activities

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify Simon McQueen as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur, in the future.

We also encourage you to raise concerns about any issue, or suspicion, of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with Simon McQueen.

Bright Heart's modern slavery risk is considered low given the nature of its services, UK-based operations, professional tutoring model and limited supply chain. However, we remain alert to potential risks in recruitment, contracted services, agency arrangements, suppliers and any third-party services used in the delivery of provision.

Bright Heart undertakes appropriate checks on employees, tutors, contractors, recruitment agencies and suppliers to help ensure that those working for, or on behalf of, Bright Heart are suitable, permitted to work and treated fairly. This includes safer recruitment checks, identity and right-to-work checks, references, appropriate DBS checks where relevant, and written contracts for employees and self-employed tutors.

All our employees and contractors are paid fairly according to legal requirements and market practice, the arrangements for which are properly and lawfully set out in their written contracts.

The health and safety of all of our employees and workers is also of paramount importance to Bright Heart, and we take our legal obligations very seriously, including in relation to working hours, rest breaks, and holidays.

#### 4 Reporting obligations of Bright Heart's Employees and tutors providing services

Staff and tutors are made aware of safeguarding and reporting expectations through onboarding, policies and ongoing guidance. Relevant concerns may also be considered under Bright Heart's safeguarding procedures.

We expect you to immediately report to Simon McQueen any reasonable grounds for believing that any of the prohibited activities listed in this policy are occurring in any of our business activities or supply chains.

Our designated person, identified above, will take any report made to them very seriously and will promptly and responsibly investigate the allegations made or suspicions shared. They will make recommendations to and agree with our board of directors on the actions that should be taken following any such investigation.

We 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 their 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 Simon McQueen immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure, which can be found set out in our Grievance Policy, which is available upon request.

### 5 Compliance obligations on Bright Heart's suppliers

We expect our suppliers, contractors and business partners to act lawfully, ethically and consistently with the principles set out in this policy.

Bright Heart takes a proportionate and risk-based approach to supplier checks, taking into account the nature of the goods or services provided, the supplier's role in supporting our business or provision, and any potential modern slavery risks. Where appropriate, Bright Heart may ask suppliers or contractors to confirm that they comply with relevant legal obligations and do not engage in, support or knowingly tolerate slavery, forced or compulsory labour, servitude, child labour or human trafficking in any part of their business or supply chains.

If Bright Heart becomes aware, or has reasonable grounds to suspect, that a supplier, contractor or business partner is acting in breach of this policy, we will consider appropriate action. This may include seeking further information, requiring remedial action, suspending the relationship, terminating contracts where appropriate, and considering whether any report or referral should be made to relevant authorities.