

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

- 1.1 This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Babington's anti-slavery and human trafficking statement for the current financial year.
- 1.2 Babington is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. This statement sets out the preventative steps that Babington is taking (and intends to take) to avoid the risk of modern slavery occurring within its services.

2. Organisational structure

- 2.1 Babington is a professional training provider that employs approximately 400 colleagues, operating in the United Kingdom. Its core business is teaching a learner population of approximately 7,000

3. Due diligence processes

- 3.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, Babington will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.
- 3.2 Babington has in place systems to:
- Identify and assess the potential risk areas in our supply chains.
 - Mitigate the risk of slavery and human trafficking occurring in our supply chains.
 - Monitor potential risk areas in our supply chains.
 - Protect whistle blowers.
 - Undertake appropriate pre-employment checks on directly employed colleagues and require agencies to provide assurance that pre-employment clearance has been obtained for associates.
 - Implement a range of controls to protect colleagues from poor treatment and/or exploitation, which comply with all respective laws and regulations.

These include provision of fair pay rates, fair Terms of Conditions of employment and access to training and development opportunities

- Require all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through affirming commitment to Babington's principles of ethical business. All of which set out our commitment to ensuring no modern slavery or human trafficking related to our business.
- Where possible, build long-standing relationships with suppliers.

4. Supply chains

- 4.1 The Corporate Services Director is responsible for compliance with relevant EU tender rules and regulations.
- 4.2 When procuring any types of goods or services, Babington requires potential supplier to affirm commitment to the principles of ethical business conduct that guide Babington.
- 4.3 Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or Babington's own policies and procedures, will be removed from the preferred list of suppliers and will not be considered for future supply to the organisation unless they can demonstrate that these compliance requirements are met.
- 4.4 In terms of future steps, Babington will review the viability of introducing other due diligence processes on an ongoing basis for monitoring and managing identified risks, including risks associated with particular countries and products

5. Training

- 5.1 Advice and training about modern slavery and human trafficking is available to staff through our Safeguarding training and our Safeguarding policies and procedures.

6 Recruitment practices

- 6.1 Temporary colleagues and colleagues recruited indirectly by Babington are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, Babington conducts checks on such agencies before they are approved.
- 6.2 Through its recruitment processes, Babington ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

7 Babington policies

7.1 Babington already implements the following policies, which embed good practice and providing remedies for individuals concerned about any potential instances of modern slavery in any part of the business. Babington operates the following policies:

Grievance and Whistleblowing policies – these policies allow colleagues, learners and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

Recruitment & Induction policy – this policy ensures that Babington follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

8 Performance indicators

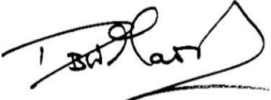
8.1 Where Babington has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. Babington will consider setting and reviewing KPIs in the following contexts:

- use of grievance and whistleblowing procedures by colleagues to raise concerns about instances of modern slavery.
- training and awareness-raising amongst colleagues including risk management; appropriate decision-making and timely remedial action.
- Review of third-party suppliers of relevant goods and services supply chains

This statement will be made available to all colleagues, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst colleagues by other measures, including discussion of this statement during the induction process for new colleagues.

This statement has been approved by the Babington's senior executive board and will be reviewed at least once annually.

Signed:



David Marsh
Chief Executive Officer
Date: 01 April 2021