



Modern Slavery Policy

Change history		
Version	Effective From Date	List of Amendments or remarks as applicable
1.	31 August 2022	First Authorised version
1.	1 February 2023	Annual review, no changes.
1.	1 February 2024	Annual review, no changes.



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Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees, directors, agency workers, seconded workers, volunteers, agents, contractors, external consultants, suppliers, third-party representatives and business partners.

Purpose

LDN Apprenticeships is committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

Review Period and Ownership

The policy is owned by the HR Manager. LDN Apprenticeships will review the Modern Slavery Policy every 12 months.

Any changes to the Modern Slavery Policy will be communicated to all staff, external contacts and suppliers.

Promotion of Policy

A copy of this policy is publishing on the policies page of the LDN Apprenticeships website. To view the online copy, please visit www.ldnapprenticeships.com/ldn-policies

This policy can be made available on request.

Engagement and Training

This policy can be accessed by employees via the Company's Intranet and also on the Company's website. All relevant staff are required to read and sign this policy as part of our engagement and training, which is undertaken through our HR system, BambooHR and a record of this is kept on the employee's file.

Relevant staff will be issued with this Policy when there are any updates and staff will be required to reread the policy as part of their annual compliance update training. Updates will also be reflected in the version of this policy which is made available on the Company's website.



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Modern Slavery Policy Statement

Modern slavery 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.

LDN has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

Responsibility for the policy

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Compliance with the policy

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

Employees must notify their Line Manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If an employee believes or suspect a breach of this policy has occurred or that it may occur, they must notify their Line Manager or report it in accordance with the Company's Whistleblowing Policy as soon as possible. If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, they should raise it with their Line Manager.

LDN 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. We are committed to ensuring no one suffers any detrimental treatment, as a result of reporting in good



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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 part of our supply chain. If an employee believes that they have suffered any such treatment, they should inform their Line Manager immediately.

Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Our Suppliers

We expect our suppliers and other companies we engage with to ensure their goods, materials and labour-related supply chains are:

- Fully compliant with the Modern Slavery Act.
- Transparent, accountable and auditable.
- Free from ethical ambiguities.

We ensure all our suppliers adhere to our Anti-Slavery Policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies which contain or reflect anti-slavery measures, we will immediately seek to terminate our relationship with the relevant supplier

Risks

We do not consider that we operate in high-risk sectors or locations because of the nature of the services we provide and the location and composition of our suppliers.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Policy Sign Off

The current version of this policy has been signed off by the Chief Executive Officer.



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Signature

A handwritten signature in black ink, appearing to read 'S. Bozzoli', written over a horizontal line.

Name

Simon Bozzoli

Date

1st February 2024