# Anti-slavery policy

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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.

This policy applies to both Virtual Class Ltd, which operates under the name Third Space Learning (TSL) in the UK, and Third Space Learning Inc in the United States. We have a zero-tolerance approach to modern slavery, and are committed to acting ethically and with integrity in all our business dealings.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work checks in relevant jurisdictions, to safeguard against human trafficking or individuals being forced to work against their will.
2. **Equal Opportunities.** We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations in the local region. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.
3. **Safeguarding policy.** We adhere to the principles inherent within our safeguarding policy.
4. **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business, or other suppliers, without fear of reprisals.

Our approach to procurement and our supply chain includes:

- Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes.
- Requiring that the main contractor provides details of its sub-contractor(s) to enable Third Space Learning to check their credentials.
- Randomly requesting that the main contractor provides details of its supply chain.

- Ensuring invitation to tender documents contain a clause on human rights issues.
- Ensuring invitation to tender documents also contains clauses giving Third Space Learning the right to terminate a contract for failure to comply with labour laws.

This statement covers Virtual Class Ltd including Third Space Learning (TSL) as well as our wholly owned subsidiary in the United States, Third Space Learning Inc.

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 suppliers.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## Responsibility for the policy

Third Space Learning has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Third Space Learning has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Bryan Tookey, the Company Secretary.

## Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business, or other suppliers 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 are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, or other suppliers at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager OR a Company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our business, or other suppliers constitutes any of the various forms of modern slavery, raise it with your line manager OR a Company Director.

We aim 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 faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business.

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 your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in our domestic business, is part of the annual training conducted by all employees, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all employees, suppliers, contractors and suppliers at the outset of our business relationship with them and reinforced as appropriate thereafter.

**Reviewed by:** Rob Langman

## Breaches of this policy

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

## Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business, and other suppliers if no successful reports are received from our staff, contractors, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

We aim for zero confirmed instances of modern slavery. However, we measure the success of our policy by the increased number of staff trained to identify risks and the utilization of our grievance mechanisms, ensuring that any potential issues are caught and addressed immediately.

To date, Third Space Learning has had no reported or identified instances of modern slavery within our operations or supply chains. We remain committed to maintaining this record through the rigorous application of the indicators and oversight mechanisms detailed in this policy.