



Apex Educ8 LTD- Modern Slavery Policy

Our policy

Apex Educ8 LTD are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Audit and compliance.
- Human resources.
- Sales.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

Our Processes/Steps for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our clients:

- When engaging with clients, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We require that all clients we work with address modern slavery concerns in their policies.
- We collaborate with our clients and workers in order to improve standards and transparency across our supply chain.
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Our staff are encouraged to bring any concerns they have to the attention of management.

Further steps

Following annual reviews of the effectiveness of the steps we take to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Be alert to any hints, direct and indirect notifications to us by our workers and third parties of any form of Slavery, Servitude and Forced or Compulsory Labour;
- If we see, suspect or are told of any signs of this happening for example, when we visit sites, we will investigate the matter further so that we can alert the police if necessary. If risk is identified, we will assess the level of risk and take steps to prevent, monitor and mitigate the risk.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 28 February 2022.

Contact Us

Head Office: **Apex Educ8 LTD**
Apex House
1 Bridle Path
Watford
Hertfordshire
WD17 1UE

Tel: **02039295150**

Email: info@apexeduc8.co.uk

Modern Slavery Statement

1. Modern slavery statement for financial year 2020/21

We are proud of the steps we have taken to combat slavery and human trafficking.

- 1.1 Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to continue adopting further steps to combat slavery and human trafficking.
- 1.2 This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Apex Educ8 LTD has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.
- 1.3 Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Apex Educ8 LTD has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain, however small.

2. Our high risk areas

- 2.1 It is well known that the construction labour market is a target for the exploitation of workers with sector cost of supply being margin driven and unregulated companies entering this market daily. To monitor and mitigate the risk of exploitation in our supply chain we have many years adopted a due diligence process to all suppliers which comprises the following:
- 2.2 All our current Suppliers and clients have a UK based operation.

- 2.3 We aim to build long-standing relationships with suppliers and require them to adhere to our high expectations of behavior.
- 2.4 Nationwide supply chains, must have a UK based point of contact and expect their entities to have suitable human-trafficking and anti-slavery policies and processes and/or agree to adopt our ethical values in this area. Although it is not possible to have control of the full supply chain we require due diligence/ practice from every business that we have a direct relationship with.
- 2.5 We encourage and protect whistle blowers within what the law and ethics permit.

3. Our suppliers

- 3.1 Apex Educ8 LTD operates a supplier policy and maintains a preferred supplier list. We conduct due diligence processes on all our suppliers before promoting them to become a preferred supplier. This due diligence includes an online search to ensure that the particular organization has never been convicted of offenses relating to modern slavery and whenever possible, on site audits. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contravenes this policy.
- 3.2 In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:
- They have taken steps to eradicate modern slavery within their business
 - They hold their own suppliers to account over modern slavery
 - They pay their employees at least the national minimum wage / national living wage (as appropriate)
 - We may terminate the contract at any time should any instances of the practice of modern slavery come to light

4. Staff Training

- 4.1 We will provide training to relevant staff members to ensure that our procurement/buying teams understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

5. Our performance indicators

- 5.1 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 or supply chain if:
- No reports are received from employees, the public, or the authorities to indicate that modern slavery practices have been identified.

6. Approval for this statement

- 6.1 This statement was approved by the Directors Of Apex Educ8 LTD on 20th July 2024 by Tope Osazee (Director)
- 6.2 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2021/22.