

# Modern Slavery Policy

## Statement of Intent

August 2025

V1.1

<b>Title</b>	<b>Modern Slavery Policy</b>			
<b>Description</b>	This policy sets out our ongoing commitment to our responsibility to respect human rights and aligns with the United Nations Guiding Principles on Business and Human Rights.			
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<b>Date Created</b>	31 May 2024			
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<b>Version No.</b>	<b>Modified By</b>	<b>Modifications Made</b>	<b>Date Modified</b>	<b>Status</b>
1	Deanna O'Grady	n/a	31st May 2024	Approved
1.1	Head of Compliance	Annual review & update to include legislation	13/08/2025	Published

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## 1. Introduction

We are committed to preventing modern slavery and human trafficking in all aspects of our business and supply chains. This policy outlines our approach to identifying, mitigating, and addressing risks related to modern slavery, in compliance with the UK Modern Slavery Act 2015.

Hemsley is committed to combating modern slavery in all its forms. We recognise that modern slavery is a grave violation of human rights and a global issue that requires collective action. We acknowledge our responsibility to promote ethical practices and uphold human rights, and we strive to create a transparent and accountable business environment.

Overall responsibility for the implementation and oversight of this policy rests with our Executive team and it is the responsibility of all employees and business partners to understand, support, and comply with this policy.

## 2. Our company

Hemsley is a global learning and development provider that helps businesses improve their culture, strategy, and performance through engaging learning experiences.

Founded in 1991 in the UK, the company has grown to have a presence in five countries and serves clients across various sectors and industries.

We have a long-standing reputation as a world-class provider of engaging, performance-boosting and change-enabling learning and development services.

Noted especially for our digital content, learning services, leadership development and large-scale strategic solutions, we are a one-stop shop provider repeatedly chosen by clients for our innovation, agility, world-class design, and results-focused delivery.

Through the creation of learning experiences that are tailored and managed for our clients' workforce needs, we believe that talent development, done right, can have a transformative effect on people, organisations, and the experience of work.

We operate with integrity, fairness, and respect for human rights, both within our organisation and across our supply chain. We believe in treating all individuals with dignity and respect, and we work tirelessly to ensure that modern slavery has no place in our business or in the broader communities in which we operate.

## 3. Scope

This policy applies to all employees, contractors, suppliers, and business partners. It is relevant to all areas of our operations and is publicly available on our website to demonstrate our commitment to transparency and accountability.

## 4. Policy statement

Hemsley strictly prohibits all forms of modern slavery, including forced labour, servitude, human trafficking, debt bondage, and any other exploitative practices. We are committed to ensuring that our operations, employees, and business partners uphold this prohibition.

## 5. Our policies and governance

### Compliance with laws and regulations

We comply with all applicable laws and regulations related to modern slavery, including but not limited to the UK Modern Slavery Act 2015.

### Risk assessment

We conduct regular risk assessments of our operations and supply chains to identify areas where modern slavery may occur. Due diligence processes include:

- Supplier audits and questionnaires
- Contractual clauses requiring compliance with anti-slavery laws.
- Ongoing monitoring and review of supplier practices

## 6. Training and Awareness

We provide training to employees and key stakeholders to raise awareness of modern slavery risks and to ensure they understand how to identify and report concerns.

## 7. Reporting and Whistleblowing

We encourage anyone who suspects modern slavery or unethical practices to report concerns through our confidential whistleblowing channels. All reports are investigated thoroughly, and appropriate action is taken.

## 8. Modern Slavery – GRI Reporting Context

Modern slavery encompasses severe forms of exploitation where individuals are coerced into work through force, fraud, or threats. It includes forced labour, human trafficking, debt bondage, and child labour. These practices violate fundamental human rights and are prohibited under international conventions and national laws.

In accordance with GRI 408 and GRI 409, our organisation recognises the risk of modern slavery within global supply chains and commits to identifying, preventing, and mitigating such risks. We assess our operations and suppliers for exposure to forced or compulsory labour and child labour, and we implement due diligence processes to uphold ethical labour standards.

This issue is material to our business due to its potential impact on human rights, legal compliance, stakeholder trust, and reputational integrity. Our policies, training, and reporting mechanisms are designed to ensure transparency and accountability in line with the GRI Standards.

## 9. Our values

At Hemsley, our values serve as the foundation of our commitment to eradicating modern slavery. Modern slavery encompasses severe human rights violations, including human trafficking, forced labour, servitude, debt bondage, and child labour. It is a moral and ethical issue that demands collective action across industries and societies. Guided by our core principles of integrity, empathy, and justice, we collaborate with our employees, clients, and supply chain partners to promote

human rights and build a business environment free from exploitation. Our values not only shape our culture but also drive our proactive efforts to identify, prevent, and address modern slavery risks throughout our operations.

#### **Inspiring a Spirit of Learning**

- A passion for development and growth
- Fueling everyone's unique aspirations

#### **Embracing the Adventure**

- Working fearlessly to deliver great outcomes
- Moving with pace, positivity & enthusiasm



#### **Feeling Connected**

- A thirst for connection, community, and partnership
- Celebrating diversity of thought and identity

#### **Celebrating each Individual**

- Engaging and cultivating talent
- Nurturing inclusivity

## **10. Our supply chain**

We maintain a transparent and responsible supply chain by assessing and monitoring our suppliers and business partners for compliance with modern slavery standards. We expect all suppliers to share our commitment to eradicating modern slavery and to adhere to ethical business practices.

Hemsley's approach to supplier onboarding includes evaluating the nature of the service provided to determine the level of modern slavery risk. All new suppliers undergo our Supply Chain Due Diligence Assessment which may include the publication and content of the supplier's Modern Slavery Statement and its alignment with the Modern Slavery Act 2015.

Our Supply Chain, Procurement, and Associate Partners teams work closely with the Compliance team to review assessment outcomes and determine supplier risk profiles on a case-by-case basis. As part of our continuous improvement efforts, we are investing in further training for these teams to enhance their ability to assess, understand, and manage modern slavery risks independently. This will also support our goal of providing real-time reporting on supply chain compliance.

## **11. Associated Policies**

- Supplier & Internal Code of Conduct Policy
- Responsible Procurement Policy.
- Whistleblowing
- Recruitment and Promotion
- Anti-Bribery
- Diversity, Equity, Inclusion and Belonging

## **12. Monitoring and compliance**

We encourage open communication and reporting of any concerns related to modern slavery. Our employees, suppliers, and other stakeholders are encouraged to report any suspicions, incidents, or breaches of our policies via our Whistleblowing Policy (see Section 7). We investigate all reports thoroughly and take appropriate actions, which may include termination of contracts or relationships with non-compliant parties.

## 13. Continuous Improvement

We are committed to continuous improvement in our approach to modern slavery. We monitor performance, engage stakeholders, and benchmark against industry standards to strengthen our practices.