

Slavery and Human Trafficking Statement of Principles

Version 4

Springfield Training strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. Section 54 of the Modern Slavery Act 2015 requires certain organisations to develop a slavery and human trafficking statement each year. Our statement sets out what steps our organisation has taken to ensure modern slavery is not taking place.

We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

We have a zero-tolerance approach to modern slavery in our organisation and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy. We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. As part of our ongoing risk assessment and due diligence process we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct. If we find that other individuals or organisations working on our behalf have breached our fundamental principles, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that

might represent the best outcome for those individuals impacted by the breach to terminating such relationship.