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- (b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and
- (c) ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 4.2 City & Guilds specifically prohibits the use of work paid recruitment fees, compulsory overtime, child labour, discrimination, confiscation of identification documents and any act which may directly or indirectly impede freedom of movement, freedom of association, or the freedom of a worker to terminate their employment with City & Guilds.
- 4.3 City & Guilds requires the same high standards from our Suppliers. Our standard contracts include specific prohibitions against modern slavery and require Suppliers to comply with their own modern slavery policy or City & Guilds modern slavery policy if they do not have their own policy. We also expect our Suppliers to hold their own suppliers to the same high standards.

4.4

carry out appropriate due diligence where the procurement is above the minimum threshold of spend as stated in the procurement policy. Where the procurement is below the minimum threshold of spend, the City & Guilds contract manager is responsible for requesting a copy of ea

5. IDENTIFYING MODERN SLAVERY

- 5.1 Modern slavery may be found in our business, our supply chains, and outsourced activities.
- 5.2 There is no typical victim of modern slavery, and some victims do not understand

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8. REPORTING MODERN SLAVERY

- 8.1 Personnel and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:
 - (a) if you are a member of , your Line Manager;
 - (b) if you are a Supplier, your primary account manager or business contact;
 - (c) if you are a member of City & Guilds Personnel or a Supplier and you wish to remain anonymous, you may email <u>whistleblowing@cityandguilds.com</u> and your report will be dealt with in accordance with the City & Guilds Whistleblowing Policy which is available to Suppliers and Personnel on City and to Personnel via the City & Guilds intranet.

9.

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