

Modern Slavery Act Transparency Statement Financial Year Ending 31 March 2024

Period covered 1 April 2023 to 31 March 2024

1. Modern Slavery

Modern slavery, including human trafficking, are criminal offences as well as being violations of human rights.

Anti-Slavery International states that someone is in slavery if they are:

- forced to work - through mental or physical threat,
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse,
- dehumanised, treated as a commodity or bought and sold as 'property' and
- physically constrained or has restrictions placed on his/her freedom of movement.

The Modern Slavery Act 2015 defines human trafficking as the recruitment, harbouring or transporting people into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will.

We have identified modern slavery as a major risk to manage and oversee to ensure we are a compliant employer.

Our policy is that we do not tolerate modern slavery and that we will act in an ethical manner in all our business dealings.

2. Group Structure

Findel Education Ltd is owned Manutan. Findel Education is a multi-channel educational resources retailer operating across the business-to-consumer and business-to-business marketplace and for more than 20 years has been a major provider of education resources to UK and international schools.

3. Business Operating Model

We are one of the UK's leading educational resources suppliers, employing 300+ people and providing, through its established brands, an extensive choice of over 25,000 resources catering for early years through to higher education.

Findel Education Ltd supports the ten principles of the United Nations Global Compact ("UNGC") in the areas of Human Rights, Labour, Environment and Anti-Corruption. Further information can be found at:

<https://www.unglobalcompact.org/what-is-gc/participants/14320#company-information>

4. Sector Details

We provide resources for the School, the Classroom, and the Specialist:

- For the School:** An extensive range of great value everyday essentials including stationery, office equipment, audio visual, janitorial materials, cookware and non-food catering supplies.
- For the Classroom:** A complete Primary & Early Years solution for the educator, covering every aspect of the curriculum, from mathematics and literacy to art and craft supplies, furniture, and indoor & outdoor equipment.
- For the Specialists:** Focus on the provision of three specialist areas; Science, Sports and Special Educational Needs.

5. Recruitment and Wellbeing of Workers

The recruitment of new employees is governed by Findel Education Ltd.'s Recruitment policy and Human Resource standards.

During the recruitment process it is our policy to request relevant references for all employees, and, where appropriate to carry out Disclosure Barring Service (DBS) checks.

It is our policy to be an ethical and progressive company that cares for the wellbeing of its employees and all those who are involved or affected in its operations and provides a safe and healthy working environment. We seek to achieve this through legal compliance and the development and adoption of strong risk management practices and processes.

Employees are also provided with access to the Employee Assistance Program which, in partnership with UNUM, provides confidential support and advice on a variety of matters, including personal support.

We are aware of the particular risk regarding the recruitment of temporary workers in its warehouse and distribution operation. We have therefore taken care to ensure that a reputable supplier of agency workers is used. We have a strong relationship with our contracted supplier who adopt best practice regarding the recruitment of agency workers. Compliance with the Modern Slavery Act together with rights of audit are included in the contract the agency has with Findel Education Ltd. The agency is a member of the Gangmasters Licensing Authority.

6. Whistleblowing

All employees are encouraged to raise any issues or concerns in line with the Whistle Blowing Policy. There are three routes through which concerns can be raised:

- The Line Manager
- Human Resources
- Confidentially by e-mail: ethics@findel-education.co.uk

7. Supply chain

As part of Findel Education Ltd.'s ongoing commitment to the UNGC labour principles, the company works with third-party audit providers to undertake audits of its supply chain.

Whilst the company has had supply chain data provided through its own audit procedures for many years, we believe that by using a third-party provider it can provide greater transparency throughout its supply chain and customer base, for this reason we have become full members of SEDEX and, going forward, actively seek out new suppliers who use the platform to ensure we can meet the requirements of the ETI Base Code

The Ethical Trading Initiative ("ETI") base code which seeks to ensure:

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- Child labour shall not be used.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practiced.
- Regular employment is provided.
- No harsh or inhumane treatment is allowed.
- Impact on the environment is monitored.

Our policy is that:

- All New direct suppliers must adhere to the Ethical Sourcing Policy and ETI base code audits by completing a SEDEX supplier assessment questionnaire ("SAQ"),
- All new intermediary suppliers and manufacturers complete a SEDEX supplier assessment, questionnaire ("SAQ") All suppliers in High-Risk Markets must provide a recent Smeta (SEDEX) audit (or similar), and
- Suppliers must sign Findel Education Ltd.'s terms and conditions of trading which include an obligation on suppliers to ensure that neither they nor any sub-contractors are involved in modern slavery. In addition, suppliers must comply with Findel Education Ltd.'s Trading Manual which also contains obligations on suppliers regarding the prevention of modern slavery.
- We constantly monitor world events and will react where the need arises (such as no cotton from Xinjiang, no timber products from Russia/Belarus etc.)

8. Countries where goods are sourced from

Findel Education Ltd sources products as follows:

Direct sourcing from the following countries: United Kingdom, Hong Kong, China, Thailand, India, USA, France, The Netherlands, Denmark, Slovakia, Poland, Spain, Italy, Ireland, Taiwan.

UK Importer Intermediary Supplier - Countries of Origin: Australia, Bangladesh, Bulgaria, China, Cyprus, Egypt, Hong Kong, India, Indonesia, Israel, Japan, Malaysia, Mexico, Pakistan, Panama, Sri Lanka, Singapore, South Africa, USA, European Union (Finland, France, Germany, Czech Republic, Denmark, Belgium, Hungary, Ireland, Italy, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland).

Whilst the majority of goods are sourced from countries that are considered low risk, we are conscious of the fact that some of first tier suppliers source products from countries that are of a higher risk. We are also conscious that modern slavery also occurs in lower risk countries including the UK. To help mitigate the risk, we provide workshops for suppliers on modern slavery and continuously monitor our supply chain.

We have identified several countries, in Europe and Asia, as being of particular risk as regards modern slavery and particular care is taken regarding the appointment of suppliers in higher risk countries.

A high percentage of goods bought from China is sourced through Findel Sourcing (Shanghai) Limited who are an associated company based in Shanghai. They have many years of experience doing business in Asia (and China in particular). They require suppliers to have an Ethical Compliance Audit in place from a professional auditor which can include reputable audits from global retail businesses.

9. Details of the make-up of the supply chain

Sourcing split by declared country of origin.

- European (including UK) 59.56%
- Asia 34.86%
- Middle East, North Africa, and Greater Arabia 1.40%
- North America 1.27%
- South America 0.07%
- Sub-Saharan Africa 0.05%
- Australia and Oceania 0.03%
- Central America and the Caribbean 0.02%
- Rest of the world 2.73%

10. Relationship with other third parties e.g., Trade Unions

Findel Education Ltd has a good long-term working relationship with the Union of Shop, Distribution and Allied Workers for the Warehouse Operational employees at its Nottingham site.

11. Training

Modern slavery has been included in staff training and induction and is available through our digital learning platform (iHasco). Modern Slavery is included in our colleague onboarding. More detailed ethical and supply chain training has been undertaken by key Buying, Merchandise, and Quality colleagues in 2023.

12. Progress in 2023

In 2022 Findel became members of SEDEX (The world's largest data platform for supply chain assessment) to support our commitment to ensuring our supplier base adheres to the UNGC 10 principles and ETI Base Code. We now ensure all new suppliers have Supplier Membership and link with them on the platform Any supplier factory based in a high-risk market must also have a full, up to date third party audit. We continue to concentrate on our efforts on existing key suppliers completing the SAQ and gaining Supplier Membership. We are conducting a thorough risk assessment project on Supply Chain throughout 2024 with a section of this dedicated to supplier ethical practises.

We have completed all planned ethical training in 2022 and 2023 and have committed to a wider range of ethical and supply chain training for a larger number of key staff and Senior Leadership (to take place 2024/25)

Chris Mahady
CEO, Findel

Mark Whittaker
CFO/Deputy Managing Director, Findel