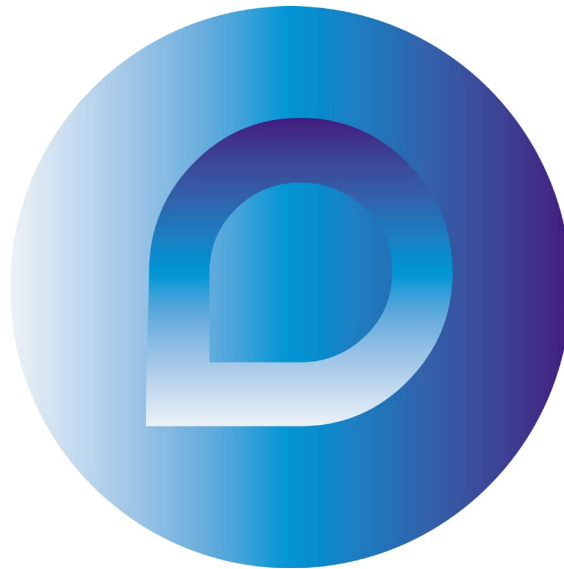


Anti-Slavery Policy



Reviewed: July 2022

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|-----------------|-------------|
| Reviewed: | 13/07/2022 |
| Expiry Date: | 12/07/2023 |
| Next Review: | July 2023 |
| Appraised: | 19/08/2019 |
| Next Appraisal: | August 2022 |

Anti-Slavery Policy Statement

By Design Group and all associated companies has a zero-tolerance approach to slavery and is committed to preventing acts of slavery and human trafficking from occurring within both its business and supply chain, and imposes those same high standards on its contractors, suppliers, and other business partners.

Company Structure

By Design Group and its associated companies works extensively with young people throughout the UK. As such, we have a supply chain, and we procure goods and services from other organisations. We work with a wide range of different suppliers, subcontractors, and partners each of which will have their own subcontractors, affiliates, and associate entities. By Design Group therefore is connected to multiple entities through numerous contractual relationships.

Due Diligence Processes

We will:

- Operate strict procurement processes, ensuring suppliers comply with all applicable laws and standards, including those which relate to the Modern Slavery Act.
- Expect our suppliers to have suitable anti-slavery and human trafficking policies and processes in place within their own businesses and to cascade those policies to their own suppliers.
- Have completed an analysis of assurance information from existing suppliers and partners and followed up where relevant.
- Procure following the advice and guidance in relation to the Modern Slavery Act set out in the Chartered Institute of Purchasing and Supply (CIPS) code of professional conduct, as appropriate.
- Provide regular training in respect of the Modern Slavery Act to relevant members of our procurement personnel, as required.
- Where appropriate, add a specific item relating to the Modern Slavery Act to the agenda of the contract management meetings with suppliers enabling us to be kept informed of any changes.
- Include appropriate terms in our contractual documentation, obliging suppliers and contractors to comply with the Modern Slavery Act and reserving the right for By Design Group and its associated companies to audit suppliers and contractors, where we consider it appropriate.
- Encourage staff to identify and report any potential breaches of By Design Group's anti-slavery policy statement.
- Whistle blowers are protected through our confidential reporting process.

The above procedures are designed to:

- Identify and assess potential risk areas in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.
- Provide adequate protection for whistle blowers.

This policy statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.