

# Modern Slavery Statement 2019/20



Busy Bees is committed to publishing an annual Modern Slavery and Human Trafficking Statement setting out the steps the company has taken and is taking to ensure that slavery and human trafficking is not taking place in our business or supply chain.

## About Busy Bees

As a leading childcare provider founded in 1983, we insist on upholding the highest standards and ethics at every level of our business and in every country where we have business interests, irrespective of local practices.

We are committed to acting with integrity, honesty, transparency and fairness at all times, to uphold our ethical standards and to protect our reputation. Our Modern Slavery Policy represents our intention to act with integrity and our commitment to do what is right.

This means that anyone working for or on behalf of Busy Bees or in partnership, providing services or resources, must abide by this policy. Busy Bees will only work with suppliers with the same ethical approach and standards we apply to our own organisation to ensure the same level of protection is afforded to employees of our contractors, suppliers and third-party partners.

We demand that all contractors and suppliers adhere to our operating guidelines which sets out our business, legal and ethical standards in respect to occupational health and safety, fair wages and benefits, work hours, transparency, freedom of association, sub-contracting, product safety, anti-bribery and environmental sustainability. Busy Bees does not and will not knowingly work with those who use child labour, forced labour, discrimination or harassment and requires all suppliers to prohibit slave labour and to prevent practices that may contribute to human trafficking.

Our robust policies and procedures, values and behaviours contribute to eliminating any opportunity for slavery to arise in our direct business. We commit to uphold the highest of standards for our own employees and to carry out due diligence to ensure our suppliers, agencies and third-parties adhere to our ethics and values.

To take steps to ensure that modern slavery is not taking place in our supply chain we commit to:

- Only work with contractors and suppliers who commit to working within our operating guidelines
- Ensure that contracts and Service Level Agreements incorporate expectations regarding slavery
- Use recognised accredited suppliers where possible
- Audit suppliers and supply chains to ensure compliance with our operating guidelines and modern slavery policy
- Provide training for suppliers, contractors and supply chain on the prevention of slave labour and human trafficking

## Our Vision

To give every child the best start in life

## Our Mission

Deliver high quality childcare and exciting opportunities for learning that give every child a head start as they prepare for school

## Our Core Values

### Care

We take care very seriously

### Service

We are an integral part of parents' support network

### Quality

We set and maintain the highest standards, it's what children and parents deserve

### Value

We ensure that we provide outstanding value for money



Simon Irons Group CEO

# Modern Slavery Policy



## Who does this policy apply to?

This policy applies to the Board, senior executives, employees of Busy Bees, suppliers, contractors, third-parties and Joint Venture partnerships.

### As a global business we recognise that slavery is a very real problem, especially in territories that have:

- Migrant labour (country to country or within a country)
- A high presence of vulnerable populations (such as refugees or ethnic minorities)
- Young workers and risk of child labour
- Contract, agency and temporary workers
- Outsourced human resources functions

### The following key principles apply to Busy Bees, its partners and supply chain:

- Compensation and benefits must comply with local laws relating to minimum wage, overtime hours and other benefits
- Passports, visas and other personal documentation should not be taken from employees
- Any form of debt bondage is prohibited

Workers will not be subject to contracts that tie them into repaying a loan, excessive accommodation expenses or other costs.

### Under no circumstances should Busy Bees engage in any business where:

- Prison labour or child labour or any form of forced or compulsory labour is used
- Workers must be free to leave employment or work after reasonable notice

Busy Bees will publish on an annual basis a modern slavery transparency statement which will set out our approach to preventing slavery

and human trafficking within our business.

### Whistleblowing/Speak UP

Busy Bees is committed to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in its business or in its supply chain. Such controls vary by territory, but may include: slavery policies and procedures, training, risk assessments, supply chain due diligence, whistleblowing policies and contractual controls.

Busy Bees sub-contractors, consultants and suppliers are expected to maintain effective systems and controls to ensure slavery is not connected to their supplies and services to Busy Bees.

These will include but are not restricted to staffing agencies, suppliers of resources, outsourced services for catering, cleaning and uniform. Also be mindful of corporate hospitality.

Busy Bees will only use agreed specified reputable recruitment agencies. We thoroughly check recruitment agencies before adding them to our list of approved agencies, where we may undertake the following:

- Conduct background checks
- Investigate reputation
- Ensure the staff an agency provides have the appropriate paperwork
- Ensure that the agency provides assurances that the appropriate checks have been made on the person they are supplying

We keep agents on the list under regular review.

### General Recruitment

Busy Bees ensures that staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work, and that staff are legally able to work in the country in question. We also check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited). We also provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

### Identifying Slavery or Trafficking

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim, namely where the person:

- Is not in possession of their own passport, identification or travel documents
- Is acting as though they are being instructed or coached by someone else
- Allows others to speak for them when spoken to directly
- Is dropped off and collected from work
- Is withdrawn or they appear frightened
- Does not seem to be able to contact friends or family freely
- Has limited social interaction or contact with people outside their immediate environment



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This list is not exhaustive. Bear in mind that a person may display a number of the indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

## Reporting Concerns

Talking to someone about your concerns may stop someone else from being exploited or abused. Employees, subcontractors, consultants and suppliers receive training on recognising the signs of slavery and how to report their concerns if they believe or know if slavery exists in or is connected to the Busy Bees business or supply chain.

It is required that any suspicions are reported to your Territory CEO, who will bring it to the attention of the Group CEO and the main Board.

If you think that someone is in immediate danger, contact the emergency services. Not all victims may want to be helped and there may be instances where reporting a suspicion puts the potential victim at risk, so it is important that, in the absence of an immediate danger, you discuss your concerns first with your Territory CEO before taking any further action. Busy Bees encourages everyone to keep their eyes and ears open and to speak up if you think there is more we can do to prevent slavery.

## Policies

To reduce slavery, Busy Bees has a clear framework of policies and expected behaviours which are reviewed annually to ensure that our core values are reflected in each Busy Bees Centre and business activity, these include:

- **Speak Up** which provides an avenue for staff and agency workers to report any concerns relating to wrongdoing or malpractice in the organisation including suspicion of modern slavery practices
- **Code of Conduct** this underpins all of our company activity and behaviours, it applies to all employees of Busy Bees wherever they are located in the world
- **Safer Recruitment** sets out our mandatory procedure for staff recruitment including background checks, declarations, and standards for compliance with local legislation
- **Human Rights Policy**
  - Whistleblowing Policy
  - Health and Safety Policy
  - Supplier Code of Conduct
  - Recruitment and agency workers standards

All contribute to reducing the potential of modern slavery in our business and associated supplier chain.

**At Busy Bees there is always someone to speak to. You can report any concerns to your Line Manager, their Line Manager, HR or through Speak Up.**



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Due to the nature of our business and our approach to governance, we assess that there is a low risk of slavery and human trafficking where we have operational control. We have medium risk in our supply chains where we purchase goods from overseas and in new overseas acquisitions.

We commit to periodically review the effectiveness of the relevant policies and procedures that we have in place and to conduct audits to ensure compliance. Modern slavery or human trafficking is against the law. Busy Bees has a zero tolerance approach to any breach of company policy.

Busy Bees approach to risk assessment comprises of desk-based research, risk assessment training and audit.

Modern Slavery risk	Level of risk	The issue	Action to mitigate	Commitments	Due date
<b>Directly employed staff</b>	Low/medium	Employment of staff not following expected recruitment procedures and checks to ensure suitability.  Payment of staff below the appropriate minimum wage guidance.	Conduct risk assessment to understand the level of risk in each country.	Roll out Modern Slavery Policy.	Q2 2019
			Introduce strict policies and procedures regarding modern slavery.	Provide on line training materials and roll out training.	Q3 2019
			Carry out sample audits on an annual basis or more often according to the risk.	Obtain CEO sign off.	Q2 2019
				Assess risk in overseas operations.	Q4 2019
				Commit to audit overseas in 2019.	Q4 2019
				Conduct robust due diligence for acquisitions in new territories.	As required
<b>Contractors</b>	Low/medium	Potential where contractors can employ low paid workers not meeting the minimum wage requirements according to local laws.	Modern Slavery Policy and expectations to form part of contracts and service level agreement.	Conduct audit on contractors. Amend contract to include modern slavery clauses.	Q3 2019
			Preference to be given to reputable contractors who are part of recognised accreditations.		
			All contractors to have a robust Modern Slavery Policy and agree to adhere to Busy Bees Modern Slavery Policy.	Audit contractors modern slavery policies.	On going
		Conduct robust due diligence on all contractors.		On going	



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Modern Slavery risk	Level of risk	The issue	Action to mitigate	Commitments	Due date
<b>Suppliers</b>	Medium	Using suppliers who use child labour or low paid migrant workers or others having less than favourable working conditions than local employees or treatment.	Conduct appropriate due diligence on suppliers.	Assess risks on individual suppliers.	Q4 2019
			Commit to using ethical suppliers with high ethical standards. Modern Slavery Policy to form part of the contract and service level agreement.	Request policy on modern slavery and other commitments to ethical supply.	Q2 2019
				Ensure policies form part of the service level agreement and contractual obligations.	Q2 2019
				Only use reputable suppliers who are part of recognised accredited associations.	
<b>Agencies and third-parties</b>	Medium	Potential where we outsource, or where suppliers outsource an agency or third-party that are breaching the Modern Slavery Act.	Review current contracts and service level agreements.	Assess risks on all outsourced services.	Q3 2019
			Amend contracts and service level agreements to consider modern slavery and other ethical policies where appropriate.	Cleaning, food supply, staffing agencies.	Q2 2019
				Provide on line training for current agencies and third parties.	
				Support agencies to meet any requirements by December 2019.	