

Modern Slavery Policy

Venture Simulations Ltd / VSL – ‘The Company’

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At VSL, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We take concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken and are taking to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

Our business and supply chains

- VSL is a UK-based small business working with no more than 50 employees, contractors and partner agents around the world. Whilst the company falls well below the standard turnover threshold that requires a policy of this nature to be in place, the directors feel it is good practice as VSL services and products are supplied worldwide.
- VSL builds and supplies digital learning solutions and learning technology
- VSL's main base and core team is in the UK and supplies products globally

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Risk assessment

We conduct a risk assessment annually of appropriate suppliers and take into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment determines our response and the risk controls that we implement.

Policies

VSL operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing procedure - we encourage all employees, contractors, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of Conduct - our code encourages all the people with whom we work to do the right thing by stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of conduct and ethical behaviour when operating abroad and managing our supply chain.

Supplier due diligence

Wherever possible, VSL seeks to conduct due diligence on all new suppliers during on-boarding and at appropriate intervals. This includes:

- Assessing risks in the provision of particular services
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

Chosen suppliers:

- Don't use any form of forced, compulsory or slave labour
- Don't make the people with whom they work volunteers
- Don't prevent people from leaving work
- Don't require the people with whom they work to deposit/bond or withhold their salaries
- Don't require people with whom they work to surrender passports or work permits as a condition of employment

Training and Measuring Performance

As the company grows so formal training programmes will be introduced to ensure that all stakeholders adhere to best practice and/or are protected from modern slavery and human



trafficking. If appropriate, VSL will also consider defining a set of key performance indicators and controls to combat modern slavery and human trafficking in our supply chain. These include:

- Employees and contractors completing training
- Suppliers completing an ethics questionnaire
- Suppliers rolling out an awareness and training programme

