



# Pathway Group

## Modern Slavery Policy

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Version	Action	Author	Verifier	Comments	Date
V1.1	Original	Shaheed Ladak	Safaraz Ali	Creation	20.11.2020
V1.2	Review	Sajad Ali	Ahsan Husain	No Change	21.11.2022
V1.3	Review	Martin Chandler	Sajad Ali	No Change	20/11/2023

**Next Review Date:**

**20/11/2024**

## Scope & Purpose

This policy relates to the position of Pathway Group and approach to tackling Modern Slavery and complying with the legal requirements introduced by the Modern Slavery Act 2015.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Pathway Group has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This policy applies to all persons working for us or on our behalf in any capacity, including learners, employees at all levels, agency workers, seconded workers, volunteers/trainees, contractors, external consultants, third-party representatives and business partners.

We are always committed to behaving ethically and expect our learners, staff, sub-contractors, suppliers and business partners to do likewise.

## Compliance & Due Diligence

As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of the business, Pathway Group will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review. Pathway Group undertakes due diligence prior to appointing new relationships/suppliers and regularly reviews its existing relationships/suppliers. We have systems in place designed to:

- Mitigate the risk of slavery and human trafficking occurring in our business relationships/supply chains in conducting background checks
- Monitor potential risk areas in our supply chains
- Protect whistle blowers and report unethical conduct; and
- Where possible we build long standing relationships with our supply chains
- Review the compliance with the Modern Slavery Act Risk on the Risk Register;
- Awareness raising with senior employees who procure goods.
- Providing a safe, fair and supportive working environment where employees can thrive.

### **Our Performance & KPI's**

As part of monitoring the performance of Pathway Group, we have also established the following key performance indicators, which are regularly assessed by our Senior Executive Team.

- the level of modern slavery training and awareness amongst our staff
- reports of possible incidents of Modern Slavery

### **Training and Information**

The Modern Slavery Policy is available to all managers and employees on Pathway Direct (Company Intranet). New starters are directed to read all Company Policies as part of their onboarding process. Where appropriate, employees will receive additional training to raise awareness and provide relevant and up to date knowledge and information to ensure a high level of understanding. This will be refreshed on an annual basis.

All suppliers will provide such co-operation and information that the Pathway Group requires in order to confirm compliance with our code of conduct, including providing written confirmation confirming compliance and allowing Pathway Group to carry out compliance checks and audits.

### **Breaches**

We reserve the right to terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.