

Modern Slavery and Human Trafficking Commitment Statement

About Avado

Avado is a professional academy that helps people and businesses through interactive learning experiences in data, marketing, people, and agility. Avado builds capabilities and supports real change by offering new skills and mindsets through quality apprenticeships, qualifications, workshops, and modules

Our Commitment

This commitment has been made not because we are lawfully obliged to do so, but because we are an organisation with five core values of accountability, ambition, care, empowerment and transparency, and these values inspire us to do the right thing. Slavery and trafficking are more than crimes – they are an attack on humanity and are responsible for untold misery and suffering. Representing our beliefs as a human-centric organisation, this statement outlines how we contribute to preventing modern slavery and human trafficking in our business and our supply chains.

Avado provides education and skills development services to a global community of individuals and organisations. We are committed to and support international efforts to promoting ethical business practices. We commit to ensuring that slavery and human trafficking are not taking place within our directly employed workforce, or our supply chain. We have a clear roadmap to considerably improving our own promotion of ethical business practices, including but not limited to:

- Implementing ethical practice learning, digitally, for our people.
- Making sure all of our people and suppliers are aware of our procedures for whistleblowing, to encourage the reporting of any wrongdoing which extends to human rights violations known to them.

Risk Management

Risk management is embedded within the day-to-day operation of Avado. Directors of Avado have been formally identified and documented the major risks to which Avado is exposed. These risks are reviewed continuously, with the Risk Committee, comprising of the Executive and Senior Management, meeting to review and discuss quarterly the appropriateness of the controls/mitigations we have in place.

We regularly conduct internal auditing on a range of activities, alongside external audits, some are contractual, and some are voluntary. This ensures the business has appropriate



checks in place of the way in which is performs and is able to quickly identify issues that need to be remediated (as appropriate).

Ongoing Review and Management

We have raised awareness of modern slavery by;

- Training all staff to be aware of modern slavery issues to increase their awareness of modern slavery and human trafficking so that they are able to understand, identify and be able to report on these risks.
- Including compliance with the Modern Slavery Act as a condition or criterion in specification and tender documents wherever possible.
- We have on-boarding risk assessments and due diligence procedures when engaging new suppliers.

These commitments and our approach to promoting ethical business practices will be reviewed at least annually.

Signed on behalf of AVADO Learning Ltd and BC Arch Ltd:

A handwritten signature in black ink that reads "Amy Crawford".

Amy Crawford

Chief Executive Officer

1 Document Control

| DOCUMENT NAME | VERSION | MASTER COPY LOCATION |
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2 Revision History

| Version | Date | Amended By | Summary of changes |
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| V1 | 2019 | Keith Harvey | Based line |
| V1.2 | 01/11/2021 | Simon Kennedy | Brand update and review of content - No change |
| V1.2 | 24/06/2022 | Keith Harvey | Updated with change of CEO |
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3 Document Reviews

This document has been reviewed for QC purposes by the following, in addition to those on the 'approvers' list.

| Version | Date | Name | Title / Role |
|---------|------------|--------------|--------------------------|
| V1 | 2019 | Keith Harvey | Head of Group Compliance |
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| V1.2 | 24/06/2022 | Keith Harvey | Head of Group Compliance |
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4 Approvals

This document requires the following approvals for implementation and / or for any change in content.

| Version | Date | Name | Title / Role | Approval Status (Pending/Approved) |
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| 1.2 | 24/06/2022 | Amy Crawford | COO | Approved |
| 1.2 | 24/06/2022 | Dean Corbett | CPO | Approved |