

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1 AUGUST 2024

## Strive Training - Modern Slavery Statement

1<sup>st</sup> August 2023

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This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Strive Training to prevent modern slavery and human trafficking in its business and supply chains.

### Introduction

Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. Strive Training recognise that, as a commercial organisation, it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms. We are committed to preventing slavery and human trafficking in our corporate activities and to ensuring through a process of vigorous investigation that our supply chains are, to our knowledge, free from slavery and human trafficking.

We have always taken ethical trading seriously, having adhered to stringent ethical and environmental supplier procedures since we first began trading in 2010. These procedures have ensured our supply chain and products are safe to use, fit for purpose and manufactured in ethically maintained and environmentally responsible conditions.

### Organisational structure, business and supply chains:

Strive Training's primary business is the provision of short, accredited training courses to groups of unemployed adult learners. Our supply chain is very limited and we procure goods and services from a restricted range of UK suppliers. The suppliers that we use have published modern slavery statements on their websites if they are not subject to Section 54. Those suppliers who are subject to Section 54 are compliant. We aim to identify, assess and manage risks on an ongoing basis by gathering information from our suppliers during the procurement process regarding their awareness of, and compliance with, the Act, and endeavour to ensure that appropriate contractual provisions are built into our supplier contracts.

### Current Activity:

We undertake due diligence when considering new suppliers and reviewing existing suppliers. This due diligence includes:

- Understanding our supply chain to identify and assess particular product or geographical risks of modern slavery and human trafficking;
- Conducting supplier audits to the [Ethical Trading Initiative](#) (ETI) base code standards where possible, such as the [Sedex Members Ethical Trade Audit](#) (SMETA) and the [Business Social Compliance Initiative](#) (BSCI);
- Evaluating modern slavery risks through the assessment of our 'Supplier Questionnaire', 'Social Responsibility Declaration', 'Slavery Declaration' and 'REACH Declaration';

- Terminating relationships with suppliers that fail to improve their performance in line with an action plan or violate our supplier code of conduct;
- Creation of a formal Supplier Management and Ethical Supply team;

We expect our supply chain to respect and comply with all applicable laws, including The Modern Slavery Act 2015 (The Act), and under our standard contracts, Strive Training reserves the right to terminate its arrangements with a supplier which is found to be in breach of The Act.

## **Our Policies**

**Whistleblowing Policy** - we encourage all our employees to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment and any other matter of a serious nature. All reports will be fully investigated and addressed with corrective action.

**Sustainability Policy** - we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to declare that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour. Serious violations of the company's Sustainability Policy will lead to the termination of the business relationship.

We adopt a zero-tolerance policy towards Modern Slavery of any kind within our operations and supply chain. Suppliers failing to meet the company's ethical and environmental standards will be subject to a mandatory and timed Corrective Action Program (CAPR). Failure to evidence the required improvements within the agreed time frame will result in the relationship with the supplier being terminated. Similarly, evidence of forced labour in the supply chain will result in the relationship with the supplier being terminated and the supplier being reported to the relevant authorities.

Strive Training has received zero reports from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified. This is considered a key performance indicator to measure the effectiveness of this statement.

All staff have been made ware aware of the Modern Slavery Act 2015 and have been informed of the appropriate action to take if they suspect a case of slavery or human trafficking in the organisation or any of its supply chains.