



Reviewer: Executive Team

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Public

Modern Slavery Policy

Applicability Statement

This policy applies to all divisions, subsidiaries, departments, and associated organisations within Twin. It is binding on all employees, contractors, and stakeholders engaged in activities on behalf of the Group, regardless of business unit or location. All members of the Group are expected to adhere to the principles, standards, and requirements set out herein.

Archbury Holdings Limited has adopted this policy of Twin Training International Limited at acquisition of some of its subsidiaries. These policies remain in place until December 2026. Over this time Archbury Holdings Limited will review these arrangements and implement its own policy.

Purpose

The purpose of this policy is to set out Twin's commitment to preventing modern slavery and human trafficking within its operations and supply chains. It establishes clear expectations for all staff, contractors, and partners, ensuring that risks are identified, managed, and reported appropriately. This policy supports compliance with the Modern Slavery Act 2015 and reinforces Twin's commitment to ethical practice, safeguarding, and corporate responsibility.

Introduction

Twin is committed to conducting all business activities with integrity, transparency, and respect for human rights. Modern slavery remains a significant global issue and can occur in many forms, including forced labour, human trafficking, and exploitation. As a training provider working with diverse participants, employers, and supply chain partners, Twin recognises its responsibility to remain vigilant and proactive in identifying and addressing any potential risks. This policy outlines the approach taken to prevent, identify, and respond to modern slavery concerns.

Scope

This policy applies to all individuals working for or on behalf of Twin, including employees, volunteers, contractors, subcontractors, and supply chain partners. It covers all business activities across all divisions, subsidiaries, and associated organisations within Twin.

The policy applies to:

- All staff and representatives of Twin



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- All learners and participants engaged in Twin provision
- All employers, partners, and subcontractors within the supply chain

All parties are expected to adhere to this policy and uphold the standards set out to prevent modern slavery and protect individuals from harm.

Policy Statement and Commitment to the Modern Slavery Act 2015

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking (e.g. sexual exploitation), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Twin Group has a zero-tolerance approach to modern slavery within its business and supply chain. Although Twin Group does not meet the statutory requirements in relation to the Modern Slavery Act 2015, the Group is committed to:

- (a) Acting ethically and with integrity in all our business dealings and relationships.
- (b) Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our business or in any of our supply chains.
- (c) Ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with the disclosure obligations under the Modern Slavery Act 2015.

Scope

This policy covers all employees across the Group and its federated businesses, participants, contractors and everyone we do business with.

Legal Context

The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to combat modern slavery in the UK and it consolidates several pieces of prior legislation into the two main offences of; 1) Slavery, Servitude and Forced or Compulsory Labour and; 2) Human Trafficking. The seriousness of these offences was recognised by an increase in the maximum sentence to life imprisonment. The act extends to England and Wales. It received Royal Assent and became law on 26 March 2015.

Provisions

The act contains a number of provisions:

- The consolidation of the existing slavery and trafficking offences

- The introduction of two new civil orders to enable the courts to place restrictions on those convicted of modern slavery offences, or those involved in such offences but not yet convicted
- The establishment of an independent Anti-Slavery Commissioner to encourage good practice on the prevention of modern slavery offences and the identification of victims.
- The provision of mechanisms for seizing traffickers' assets and channelling some of that money towards victims for compensation payments
- The creation of a new statutory defence for slavery or trafficking victims compelled to commit criminal offences
- The provision of child trafficking advocates

Definitions

Section 1 of the Act - Slavery, Servitude and Forced or Compulsory Labour

This is defined as 'where a person holds another person in conditions of slavery or servitude or requires another person to perform forced or compulsory labour and that person knows, or ought to know, that the other person is being held as such'. This includes any work or service which is extracted from a victim under threat or menace or deception.

Section 2 of the Act - Human Trafficking

This is defined as 'where a person arranges or facilitates the travel of another person with a view to that person being exploited'. The Act now provides a single offence of Human Trafficking, covering sexual and nonsexual exploitation. This involves the recruitment, transportation, transfer, harbouring or receipt of victims for the purposes of exploitation; either within or without the victim's consent, either inside or outside the UK

Section 3 of the Act – Meaning of Exploitation

The Act defines exploitation as; Slavery, servitude and forced or compulsory labour; Sexual exploitation; Removal of organs; Securing services by force, threats or deception; Securing services from children and vulnerable persons.

Criminal exploitation and the Section 45 Defence

Section 45 of the Act provides a statutory defence to victims who have committed a crime themselves. It does not extend to more serious offences such as rape or murder. Offences to which the Section 45 defence can be applied include drug dealing, cannabis cultivation, shop lifting, benefit fraud, pick pocketing and begging. If a person raises the Section 45 defence officers must take steps to investigate.

The Modern Slavery Act 2015 has been updated in 2024.

In 2024, significant updates to the Modern Slavery Act 2015 have implications for training providers in the UK, particularly those engaged in educating businesses or delivering corporate training. These changes are aimed at enhancing transparency, strengthening compliance, and increasing accountability for organisations in addressing modern slavery risks within their operations and supply chains.

Key Changes in 2024 for Training Providers

1. Enhanced Reporting Requirements

Training providers that meet the threshold (annual turnover of £36 million or more) are required to publish detailed Modern Slavery Statements. As of 2024, these statements must now cover six mandatory areas, including organisational structure, policies, risk assessments, due diligence processes, effectiveness in combating slavery, and staff training programs on modern slavery risks. This is a shift from earlier guidelines where these areas were only suggested.

2. Mandatory Training and Awareness

Organizations, including training providers, are now required to offer specialized training to their staff on how to identify and mitigate modern slavery risks. This includes internal awareness programs and training sessions for employees on how to spot potential indicators of modern slavery within their own operations and supply chains.

3. Civil Penalties and Enforcement

Failure to comply with the reporting requirements or providing false or incomplete statements can result in civil penalties, including substantial fines. Training providers that do not meet the legal requirements for publishing modern slavery statements risk facing enforcement actions from the government.

4. Public Reporting Platforms

From 2024, all organizations that are required to submit modern slavery statements must publish them on a government-run registry. This registry allows for public scrutiny, enabling the public, investors, and stakeholders to compare how different organizations are responding to modern slavery risks. This added layer of transparency is intended to increase accountability across sectors, including the education and training industry.

Conclusion

The 2024 changes to the Modern Slavery Act 2015 present new challenges for training providers. It is crucial for providers to ensure compliance with the updated requirements by enhancing transparency, improving training programs, and maintaining accurate reporting to avoid penalties and reputational risks.

To address the revised indicators and statutory requirements, Twin Group has undertaken a self assessment, in line with Department of Work and Pension guidelines, and has identified a number of areas for improvement. As a result a rigorous improvement plan is in place, with updates to be reported to Board on a monthly basis, to assess progress and demonstrate our commitment to the Act.

Indicators of Modern Slavery

A thorough knowledge of what may indicate that someone is falling victim to modern slavery is essential for both individuals and businesses.

Knowing the signs and adequately reporting suspicions can make a significant difference to, not only the victim's wellbeing but also to preventing further cases.

There are many indicators of modern slavery, not all will be applied to the same case and some may be difficult to immediately identify. At the same time, a person may display a

number of the indicators set out below, but they may not necessarily be a victim of slavery or trafficking. The list below is not exhaustive:

- a) The person is not in possession of their own passport, identification or travel documents or have falsified documents.
- b) Physical signs of neglect, i.e. poor health, sanitation or malnourishment.
- c) The person has poor spoken English.
- d) The person is forced to work to pay off a debt (Debt Bondage) They are tricked into working for little or no pay, with no control over their debt. Most or all of the money they earn goes to pay off their loan.
- e) The person is acting as though they are being instructed or coached by someone else.
- f) The person may be unable to relay their home address.
- g) Psychological signs, i.e. depression, suicidal behaviour, anxiety or psychosis.
- h) The person allows others to speak for them when spoken to directly.
- i) The person is often forced to work excessive hours over long periods of time without having days off.
- j) The person may have marks, scars, tattoos or other signs that indicate an 'ownership' by exploiters
- k) The person is dropped off and collected from work.
- l) The person may have a history of pickpocketing, shoplifting and other crimes known as 'survival offending
- m) The person is withdrawn or appears frightened.
- n) The person does not seem to be able to contact friends or family freely.
- o) The person has limited social interaction or contact with people outside of their immediate environment.

Reporting Modern Slavery

Twin Group personnel and Volunteers working with participants

Twin Group personnel and Volunteers must discuss their suspicion/incidence with their Line Manager/Team leader and Twin Group's Safeguarding Lead immediately.

Please be aware that if an individual or group of people are in immediate risk of danger and/or in harm , the police must be immediately notified on 999.

Next Steps

Twin Group's Safeguarding Lead will advise all relevant parties of immediate actions to be taken following the recent concern(s). Some of these actions may include:

- a) Calling the Police on 999
- b) Contacting the Modern Slavery Helpline on 0800 0121 700
- c) Filing a report on line <https://www.modernslaveryhelpline.org/report>
- d) Referral to an external agency

Modern Slavery concerns connected to Supply Chain partners

Should any modern slavery concerns arise about any supply chain partners, then the concern must be discussed initially with the Contract Manager who in turn will notify Twin Group's Safeguarding lead.

Please be aware that if an individual or group of people are in immediate risk of danger and/or in harm, the police must be immediately notified on 999.

Next Steps

Twin Group's Safeguarding Lead will advise all relevant parties of immediate actions to be taken following the recent concern(s). Some of these actions may include:

- a) Calling the Police on 999
- b) Contacting the Modern Slavery Helpline on 0800 0121 700
- c) Filing a report on line <https://www.modernslaveryhelpline.org/report>
- d) Referral to an external agency
- e) Suspending the contract with the Supply Chain Partner
- f) Conducting a full investigation into the general safeguarding arrangements of participants

Any concerns connected to Modern Slavery will be shared with the Chief Executive Officer and Senior Management Team of Twin Group.

Useful Contact Details



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Modern Slavery Helpline: 0800 0121 700

Modern Slavery Website: <https://www.modernslaveryhelpline.org/>

Filing a report on line <https://www.modernslaveryhelpline.org/report>

Twin Group Designated Safeguarding Lead

safeguarding@twinuk.com

The policy applies to all Twin Group Companies