

5.1 Preventative measures

Metadata will take the following steps to further the goals of the Modern Slavery Act 2015:

- I. Seek to conduct risk assessments to determine which parts of Metadata and its suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- II. Engaging with our suppliers to convey to them Metadata's position on modern slavery and to understand the measures taken to prevent modern slavery in their own businesses.
- III. Seek to introduce additional pre-screening measures for all suppliers.
- IV. Publishing this statement and policy on Metadata's website to clearly display Metadata's support to end modern slavery.

5.2 Due diligence for our supply chains

- I. Metadata will not knowingly support or deal with any businesses found to be involved with any acts of slavery or human trafficking. Metadata has a zero-tolerance policy on matters of slavery and/or human trafficking and expects suppliers and associated businesses to comply with these values.
- II. Metadata's supplier approval process incorporates a review of the controls undertaken by Metadata's potential suppliers.
- III. The vast majority of Metadata's sources are from inside the United Kingdom and as such are less at risk of slavery and human trafficking issues.

6. REPORTING MODERN SLAVERY

- I. This policy should be read in conjunction with Metadata's [whistleblowing and safeguarding policies](#) both of which are accessible to all staff. The whistleblowing and safeguarding policies are intended to provide guidance on how concerns can be communicated to the organisation.
- II. Any suspected instance of modern slavery or human trafficking within Metadata or its suppliers must be reported to one of Metadata's Designated Safeguarding Officers (DSOs), who will investigate and advise the appropriate people and external organisations of any further actions.

- III. Further information regarding the reporting procedures can be found in Metadata's Safeguarding policy. The aforementioned policies apply to all employees and may be found in the central digital document storage area.

7. RESPONSIBILITIES

- I. Ultimate responsibility for the prevention of modern slavery within Metadata rests with our compliance officer. Metadata's compliance officer has overall responsibility for ensuring that this policy and its implementations comply with our legal and ethical obligations.
- II. Compliance officer is responsible for ensuring all staff and Tutors understand and comply with this policy.

8. COMMUNICATION AND AWARENESS

This policy is displayed on Metadata's Google-Drive system, the policy location is conveyed to all staff members at their induction recruitment.

9. REVIEW

The Modern Slavery Statement and Policy will be reviewed annually by Metadata's compliance officer in accordance with clause 6 of the Modern Slavery Act 2015.

Training

We regularly conduct training for our team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by Company Director on 22/06/21

Name Mike Goodland

A handwritten signature in black ink that reads "M. C. Goodland". The signature is written in a cursive style and is positioned above the word "Signature".

Signature