

# NIMBLE LEARN LTD

## MODERN SLAVERY STATEMENT

### INTRODUCTION

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31st August 2021.

Nimble Learn Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

### ORGANISATIONAL STRUCTURE

Nimble Learn Ltd has business operations in the United Kingdom.

We operate in the information technology sector. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with goods, such as equipment for our premises, and services, such as outsourced business processes, IT software, and marketing services.

For more information about the Company, please visit our website: [www.nimblelearn.com](http://www.nimblelearn.com).

### POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Recruitment and selection policy - We conduct checks on all prospective employees to verify that they are eligible to work in the UK. Certain roles require a Disclosure and Barring Service (DBS) check.
- Supplier code of conduct - We operate this policy to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.

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- Staff code of conduct - We are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.

We make sure our suppliers are aware of our policies and adhere to the same standards.

### DUE DILIGENCE

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains

### RISK AND COMPLIANCE

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK and in low-risk industries, such as internet software and services.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

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### Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- The percentage of suppliers who have and maintain a modern slavery and human trafficking statement
- The percentage of suppliers who agree to the contractual wording relating to modern slavery and human trafficking without substantive modification

This statement was approved by the board of directors on 15<sup>th</sup> September 2021