

# Modern Slavery and Human Trafficking Statement

**Financial year ending 31 July 2025**

*(Issued pursuant to Section 54, Part 6 of the Modern Slavery Act 2015)*

## 1. Introduction

Creative Learning Systems (“CLS”) is committed to upholding the highest ethical standards in all our operations and supply chains. We oppose all forms of modern slavery, forced labour, human trafficking, and exploitation. This statement sets out the steps CLS has taken during the financial year ending 31 July 2025 to prevent modern slavery within our business and to promote transparency and accountability wherever we operate.

## 2. Our Organisation

CLS develops and delivers learning management systems, software solutions and digital services across business, education, healthcare, government and sport. We are a UK-based organisation with additional supported operations in the Philippines and development capability in India.

We employ staff directly in the UK and work with a very small number of specialist contractors internationally. Our business model is service-based and our operational footprint is low-risk, with no manufacturing, physical supply chains or high-risk labour environments.

## 3. Our Commitment

CLS maintains a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity, ensuring that the rights and wellbeing of workers are safeguarded. We continue to strengthen our internal processes, staff training and supplier due diligence to ensure full compliance with the Modern Slavery Act 2015.

## 4. Policies Supporting Our Approach

To uphold our commitment, CLS maintains a suite of policies, including:

- Modern Slavery Policy
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Recruitment and Right-to-Work Policy

- Health, Safety and Wellbeing Policy
- Supplier Code of Conduct (applicable to relevant partners)

These policies are reviewed regularly and are accessible to staff. They set clear expectations for behaviour, reporting obligations and consequences of non-compliance.

## 5. Our Supply Chain

CLS's supply chain remains extremely limited. We do not procure goods or engage in manufacturing. Our principal suppliers and partners are:

- Amazon Web Services (AWS), which provides our hosting infrastructure
- One independent software developer based in Ahmedabad, India
- Standard UK-based professional services where required

No new suppliers were added during this reporting period. Based on our operational model, our overall supply chain is considered **very low risk** for modern slavery.

## 6. Risk Assessment

In 2024, CLS commissioned an independent risk analysis of our operations and supply chain. This assessment found:

- **No significant risks** relating to modern slavery or forced labour
- Minimal exposure due to the nature of our business and suppliers
- No indicators of concern within our international contractor arrangements
- No required remedial actions

This confirms that CLS's operating environment continues to present a very low risk of modern slavery. We will repeat this assessment periodically to ensure continued compliance.

## 7. Due Diligence and Supplier Oversight

CLS applies proportionate due diligence to all third parties. This includes:

- Requiring suppliers to adhere to our ethical standards
- Including modern-slavery-related obligations in our contracts
- Requesting anti-slavery statements from suppliers where applicable

- Maintaining direct oversight of our international contractor relationships
- Reserving the right to terminate agreements if any breach is identified

Given the limited number of suppliers and the nature of the services, we maintain close visibility of all existing contractual relationships.

## **8. Training and Awareness**

Modern slavery awareness training is mandatory for all staff and forms part of our onboarding process. Annual refresher training ensures that employees understand:

- How to identify potential signs of exploitation
- Their responsibility to report concerns
- Where to access guidance and internal support

Procurement and contract-management staff receive additional training appropriate to their roles.

## **9. Actions Taken in This Reporting Year**

During the year ending 31 July 2025, CLS:

- Completed a full supply chain risk assessment (with no issues identified)
- Reviewed and reaffirmed our Modern Slavery Policy
- Maintained mandatory training compliance for all staff
- Updated and reissued guidance to staff on reporting concerns
- Continued oversight of our international contractor arrangements
- Reconfirmed supplier compliance with modern slavery obligations

No incidents, concerns or breaches relating to modern slavery were reported.

## **10. Future Commitments**

In the coming year, CLS will:

- Continue to monitor our small supply chain and review relevant contracts
- Maintain mandatory annual training for all staff

- Refresh our risk assessment periodically
- Strengthen documentation and oversight of international contractor relationships
- Update policies and procedures as regulatory expectations evolve

We remain committed to maintaining a transparent, ethical and responsible organisation.

## **11. Approval and Publication**

This statement has been approved by the Board of Creative Learning Systems and is published in accordance with Section 54(1) of the Modern Slavery Act 2015. It will be made available on our website via a prominent link on the homepage and provided upon request.

**Signed:**

*Hal MacLean*

Managing Director, Creative Learning Systems

A handwritten signature in black ink, appearing to read 'Hal MacLean', with a stylized, cursive script.

Date: August 15, 2025