



Modern Slavery & Human Trafficking Policy

Owner: HR

Date: July 2024

Version: 2



Juniper

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Modern Slavery & Human Trafficking Policy

Introduction

Juniper Education is committed to preventing modern slavery and human trafficking in all its business operations and supply chains.

We aim to ensure that there is no slavery or human trafficking in any part of our organisation.

This policy sets out our commitment to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to prevent slavery and human trafficking.

This commitment aligns with our Juniper vision and values, which emphasise ethical conduct and social responsibility.

Organisation Structure & Supply Chains

Juniper Education operates through a structured organisation that includes various departments and teams, all working collaboratively to deliver educational services. Our business activities span across multiple regions, involving a diverse network of suppliers and business partners.

Policies on Slavery & Human Trafficking

Juniper Education acknowledges its responsibility to comply with the Modern Slavery Act 2015 and will ensure transparency within the organisation and with its supply chains. We expect similar commitment from our suppliers, contractors, and business partners.

We will not knowingly support or deal with any business or individual involved in slavery or human trafficking.

We are committed to implementing and enforcing effective measures to identify and prevent slavery and human trafficking in our operations and supply chains. We will regularly review and update our practices to ensure their effectiveness.

Due Diligence Processes

We will conduct due diligence on our suppliers and business partners to assess their compliance with anti-slavery and human trafficking laws. This includes reviewing supplier policies, contracts, and conducting site visits where necessary.

Our due diligence process is designed to identify potential risks and ensure that our suppliers and business partners adhere to our ethical standards.

Risk Assessment & Management

Juniper Education will assess the risk of slavery and human trafficking in its operations and supply chains on an ongoing basis. This includes evaluating the countries and industries in which we operate, and the specific risks associated with our suppliers and business partners.

We will implement appropriate measures to manage and mitigate any identified risks, ensuring that our business practices do not contribute to slavery or human trafficking.

Effectiveness & Performance Indicators

We will regularly monitor and evaluate the effectiveness of our efforts to prevent slavery and human trafficking. This will be measured against performance indicators that we consider appropriate, such as the number of reported incidents, audit results, and the effectiveness of our training programs.

Training & Capacity Building

We will provide comprehensive training to our employees and management to ensure they understand the risks of modern slavery and human trafficking and their responsibilities in preventing it. New employees will receive thorough training on Juniper's stance towards human trafficking and modern slavery as part of their onboarding process.

Managers will receive regular refresher training to keep them updated on the latest legal requirements and best practices. This ongoing education ensures that our leadership remains informed and vigilant against potential risks, reinforcing our commitment to our vision and values.

Reporting Concerns

We encourage all employees to report any concerns about modern slavery and human trafficking in our organisation or supply chains. Reports can be made confidentially and without fear of reprisal.

Investigation & Action

If we discover or suspect any violation of this policy, we will take appropriate action, including reporting the matter to the relevant authorities and severing ties with any suppliers or business partners involved in slavery or human trafficking.

Review & Monitoring

We will review and monitor the effectiveness of this policy regularly, making improvements as necessary.

Communication

This policy will be communicated to all employees, suppliers, contractors, and business partners, and it will be made available to the public on our website.

Review & Approval

This policy has been approved by the Board of Directors and will be reviewed annually or as needed to ensure its relevance and effectiveness.



Juniper

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CAN LOOK AFTER OUR CHILDREN*

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