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Modern Slavery Statement 2023

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Twinkl has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, officers, and independent contractors providing services to us.

Responsibility for the policy

Twinkl's board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Twinkl's legal and finance teams have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Line managers are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training for their role on it and the issue of modern slavery in supply chains at large.

Compliance with the policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. An employee is required to notify her line manager or the legal team as soon as possible if she believes or suspects that a conflict with this policy has occurred or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If an employee believes or suspects a breach of this policy has occurred or

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that it may occur, she must notify her line manager or the legal team or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the legal team.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Communication & training

Training on this policy, and on the risk that the business faces from modern slavery in its supply chains, is being developed and will be provided to staff as necessary on a job-role basis so that they know how to identify exploitation and modern slavery and how to report suspected cases.

Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Twinkl may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Twink's slavery and human trafficking statement for the financial year ending 26th April 2023.

Approved by the board of directors.

Signed off by Jonathan Seaton, CEO

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Jonathan Seaton
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Date: 10 May 2023