

Modern Day Slavery Statement



Our Commitment

As a leading childcare provider, we insist on upholding the highest standards and ethics at every level of our business. We are committed to acting with integrity, honesty, transparency and fairness at all times, to uphold our ethical standards and to protect our reputation.

The Busy Bees vision is to give every child the best start in life, underpinned by our values of "Care, Quality, Service and Value". Our commitment to these values is codified in our Code of Conduct, which we issue to our workforce to make clear that we are expected to operate to the highest standards in everything we do.

We recognise that modern slavery is a growing global issue and we understand that we are responsible for preventing, mitigating and addressing (if necessary), these risks in our business and our supply chain. We will always treat people in our business and supply chain fairly and will not tolerate slavery, servitude, bonded, forced or compulsory labour in the manufacture of products we use and will not accept products or services from suppliers who employ or utilise slavery, servitude, bonded, forced or compulsory labour in any manner.



Simon Irons
Global CEO



Our objectives

In accordance with our commitment (set out in our statement published in 2019 ("2019 Statement")), to periodically review the effectiveness of our policies and procedures to address modern slavery and human trafficking related risks, we refined the objectives and detailed commitments set out in our 2019 Statement during this year. This refinement followed a further assessment of the risk of modern slavery and human trafficking occurring in the Busy Bees business and its supply chain, and resulted in the prioritisation of the systems and procedures implemented (as set out in this statement). Whilst we will continue to strive to implement the commitments detailed in the 2019 Statement, this will form part of a long-term continuous improvement programme for Busy Bees to address risk in this area.

Our organisation

Since inception in 1983, Busy Bees has become synonymous with quality care and education. Busy Bees is proud of its practical, child-centred approach, where children are respected as individuals and encouraged to learn and develop at their own pace within a home from home environment that meets rigorous safety standards.

From its Staffordshire roots Busy Bees has grown to become the largest provider of childcare in the UK. Our international footprint takes exceptional Busy Bees education into ten countries, crossing four continents.

The Busy Bees values are encased in the wonderful people who are employed across our nurseries and National Support Centre. Attracting the highest quality educators and highest calibre of department expertise is key in delivering exceptional education and care. With sector leading, long standing leadership teams Busy Bees is dedicated to the vision of its founders and stands by these quality standards in the UK and internationally.

Our people

The Busy Bees workforce in the United Kingdom is made up of contracted staff, consultants and agency workers. We have effective systems and controls in place to address the risk of slavery taking place in our business, in particular:

- Robust safer recruitment and employment policies and procedures for all of our staff, consultants and workers.

- We check the names and addresses, references, legal right to work and criminal record of our staff and consultants. Agencies are required to provide evidence of safer recruitment checks of any workers provided.
- We only use reputable recruitment and staffing agencies, and conduct diligence on these agencies before adding them to our approved list of agencies, including:
 - Background checks.
 - Checking agency staff have required paperwork.
 - Ensuring agencies are contractually committed to carry out checks on the staff they provide.
- We provide our staff with a confidential and anonymous Speak Up helpline where they can raise any concerns in respect of slavery in our business or our supply chains. Our helpline is supported by our Speak Up policy, with all our staff trained annually on the requirement to Speak Up to help Busy Bees address any suspected misconduct.
- Our confidential Employee Assistance Programme also provides our staff with a secure way of seeking advice about any modern slavery or human trafficking issues personally affecting them or their families.

Our supply chain

Our primary group of suppliers at Busy Bees are those that supply our centres, including food, nursery equipment, consumables, cleaning and maintenance services. We have implemented systems and controls to address the risk of slavery taking place in our supply chain, in particular we:

- Carry out due diligence on all our key suppliers prior to onboarding.
- Conduct annual reviews of our key suppliers' policies and procedures to ensure slavery is not taking place in their business.
- Expect all those in our supply chain to comply with our values, with key suppliers required to commit to modern slavery contractual obligations. We will not support or deal with any business knowingly involved in modern slavery or human trafficking.

Our policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Global Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and

controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This policy sits alongside a framework of Busy Bees policies, which ensure our values are reflected in all our activities, including:

- Speak Up - which ensures all staff have a confidential avenue to report concerns through.
- Code of Conduct - which sets out our values and expectations of our people.
- Safer Recruitment - which sets out the checks that must be completed ahead of any individual being recruited by Busy Bees.
- DBS (England & Wales) and PVG & SSSC (Scotland) - which outlines our approach to these safeguarding checks and services at Busy Bees.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide annual training to our staff.

Further steps

We will continue to periodically review the effectiveness of the steps we have taken to address the risk of slavery or human trafficking in our business and supply chain. We intend, over the next 12 months, to focus on assessing risk in our supply chain, reviewing and improving our existing systems and controls and providing focused training for our dedicated procurement team on the risks of modern slavery and human trafficking.

We will also consider, during this period, the Home Office guidance published in April 2020, which asked businesses to focus (due to the impact of the Covid-19

pandemic) on the health and safety of their workforce, considering how changes may lead to new or increased risks of labour exploitation, including:

- The health and safety of workers - adopting appropriate risk assessed measures to prevent the spread of the virus.
- Supporting suppliers - prioritising engagement with suppliers.
- Grievance procedures - ensuring that staff are still able to access these.
- Recruitment - maintaining rigorous checks during recruitment.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps Busy Bees Holdings Limited and Busy Bees Nurseries Limited (and their respective subsidiaries) ("Busy Bees") have taken (during the financial year ended 31 December 2019), and will continue to take, to address the risk of modern slavery and human trafficking occurring in the Busy Bees business and its supply chain. Whilst the publication of this statement has been delayed due to the impact of the Covid-19 pandemic (and in particular the related reallocation of management priorities during this period), the statement has been published at the same time as the publication of the annual accounts for Busy Bees. The statement was approved by the board of both Busy Bees Holdings Limited and Busy Bees Nurseries Limited on 6 November 2020.