

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.



Chris McCandless
UK CEO



Our organisation

Since inception in 1983, Busy Bees has become synonymous with high 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 now takes our exceptional education into eleven countries, crossing four continents.

Our values: Care, Quality, Service and Value underpin everything that we do across our centres and our National Support Centre. Attracting the highest quality educators for our centres and the highest calibre of department expertise is key in delivering exceptional education and care. With sector leading, long standing leadership teams Busy Bees remains dedicated to its vision to give every child the best start in life 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 our staff, consultants and workers.
- We check the names and addresses, references, legal right to work and criminal records of our staff and consultants, with a system in place to record these checks. Agencies are required to provide evidence of safer recruitment checks of any workers provided.
- We ensure all staff have their own bank account and request verification of these details from new starters. In 2022 we also updated our HRIS systems so that an individual cannot amend their bank details without additional checks being made by our People team.

- **We only use reputable recruitment and staffing agencies, and conduct diligence on these agencies before adding them to our approved list of agencies, including:**
 - o Background checks.
 - o Checking agency staff have required paperwork.
 - o 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 (managed by an independent provider 24/7, 365 days a year) where they can raise any concerns in respect of slavery in our business or our supply chains. Our helpline is supported by our Global Speak Up policy, with all our staff trained annually on the requirement to Speak Up to help Busy Bees address any suspected misconduct. In 2022, the UK did not receive any reports of modern slavery amongst our workforce.
- 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 (reviewed and updated in 2022) on all our key suppliers, which includes our entire maintenance contractor base 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. In 2022, we did not receive any notifications of any of our key suppliers' failing to comply with their modern slavery obligations.

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** - ensures all employees have a confidential avenue to report concerns through, with both the policy and related training subject to annual roll out during 2022.
- **Code of Conduct** - sets out our values and expectations of our people.
- **Safer Recruitment** - 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.
- **Europe Procurement Handbook** - sets out to all key stakeholders the expected standards of due diligence and contractual requirements for material suppliers in relation to modern slavery practice.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all staff are required to complete mandatory modern slavery and human trafficking training upon commencement of their employment. Further training is then periodically provided to staff throughout their employment.

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 chains.

Our focus in 2023 will be on:

- improving governance in our procurement and contracting processes to ensure all key suppliers are subject to the appropriate levels of due diligence;
- reviewing and improving our training, policies and procedures to ensure they remain up to date; relevant and our embedded into our ways of working; and
- conducting an audit to assess where the business is now, and what improvements have been made since our audit in 2021.

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 2022), and will continue to take, to address the risk of modern slavery and human trafficking occurring in the Busy Bees business and its supply chains. The statement was approved by the board of both Busy Bees Holdings Limited and Busy Bees Nurseries Limited on 29 June 2023.