



## **PROMETHEAN WORLD LIMITED (COMPANY) SLAVERY AND HUMAN TRAFFICKING STATEMENT**

We are proud of Promethean's decision and commitment to prohibit, avoid and reject any involvement, or any degree of acceptance or tolerance, of slavery and human trafficking in connection with, or ancillary or incidental to the company's products or business activities; and we are committed to constantly reviewing, improving and developing practices to combat slavery and human trafficking. This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

### **ABOUT US**

Promethean is a global education company that designs, develops, manufactures and sells innovative education technology solutions for the modern classroom, including hardware and software products that improve the impact of instruction and learning. Our technology solutions increase student engagement and teacher effectiveness both inside the classroom and beyond. Promethean's main corporate offices are located in Blackburn, UK and Atlanta, USA. Promethean is a member of Net Dragon Websoft Holdings Limited (HKSE: 0777) group of companies.

### **OUR SUPPLY CHAINS**

Our supply chains include: manufacturers and intermediate suppliers of complete hardware units and separate integral or external hardware components, as well as both dedicated and independent software.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no slavery or human trafficking taking place in our supply chains or in any part of our business. Our anti-slavery policy is presented in our Code of Ethics and Standards of Business Conduct which applies not only to our employees worldwide but also addresses and applies to our customers, suppliers and partners doing business with Promethean worldwide. These standards are intended to promote an ethos that reflects a commitment to high standards of integrity and compliance with all applicable laws and regulations. As part of the Company's commitment, the Standards specifically state that "Promethean does not accept and will not tolerate use of child labour or forced labour anywhere in its supply chain." The policy further reflects our commitment to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This Code of Ethics and Standards of Business Conduct can be found on our Company website; referenced and incorporated into our contracts with suppliers, distributors and resellers, and incorporated into our standard sales order terms and conditions.

### **DUE DILLIGENCE PROCESS FOR SLAVERY AND HUMAN TRAFFICKING**

In addition to the contractual requirements to comply with the Company's Code of Ethics and Standards of Business Conduct, as part of our initiative to identify and mitigate risk in this area, prior to engaging in business with suppliers, we use commercially reasonable efforts to visit our suppliers' facilities to look for workplace issues such as working hours, child labour, forced labour, non-discrimination, and health and safety issues. Additionally, we require our suppliers to complete and sign our **Supplier Assurance Questionnaire** which becomes part of our contractual relationship with the Supplier.

The Supplier Assurance Questionnaire requires our suppliers to provide assurances as to their policies on forbidding use of child labour in their operations and those of their suppliers, as well as their policies forbidding slavery, forced labour, trafficked labour, compulsory labour, servitude and human trafficking.



## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we are developing and extending our determined supply chain compliance programme. We have a dedicated compliance team, which consists of representatives or involvement from the following departments:

Legal.

Audit and compliance.

Human resources.

Procurement.

Sales.

## **TRAINING**

We regularly conduct internal training on our Code of Ethics and Standards of Business Conduct for all of the Company's employees. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are developing a continuing training program for specific applicable staff.

The Board of Directors of the Company has approved this statement at its Board Meeting on 6<sup>th</sup> July 2016.

Louise Ward – DIRECTOR



## PROMETHEAN WORLD LIMITED (COMPANY) HUMAN RIGHTS POLICY

### 1. INTRODUCTION

As a global provider of education solutions, Promethean World Limited ("Promethean") recognises its responsibility to uphold internationally recognised human rights in all aspects of its business operations worldwide.

The Board of Promethean supports the principles contained within the United Nations Universal Declaration of Human Rights, and this policy describes how Promethean seeks to observe such principles.

This policy should be read and implemented in conjunction with guidance provided in Promethean's Code of Ethics and Standards of Business Conduct, and Promethean's Slavery and Human Trafficking Policy as well as other company policies relating to specific areas of human rights.

### 2. EMPLOYEES

Promethean respects the human rights of its team members globally, as established in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, comprising non-discrimination, prohibition of child and enforced labour, and freedom of association. Promethean's framework of employment policies and procedures covers its duties as an employer, and many promote specific human rights either directly or indirectly.

Where Promethean's role as an employer may associate it in any way with actual or perceived human rights violations, these must be referred to the Head of People & Culture in the first instance, or alternatively reported via the Whistle-blowing process outlined in 5 below.

### 3. SUPPLIERS AND CONTRACTORS

As part of its due diligence process, Promethean evaluates and selects its major suppliers and contractors based upon criteria that includes their compliance with human rights and ethical policies.

Promethean expects its suppliers and other third party partners to exhibit behaviour in line with Promethean's Code of Ethics and Standards of Business Conduct and Promethean's Slavery and Human Trafficking Policy, which is published on its website.

Where Promethean's role as a purchaser of goods or raw materials may associate it in any way with actual or perceived human rights violations, these must be referred to the Head of Operations in the first instance, or alternatively reported via the Whistle-blowing process outlined in 5 below.

### 4. BUSINESS PARTNERS

Promethean's business model means it places reliance on third party distributors and resellers to distribute, market and sell its products in a wide range of markets around the world.

As part of its on-boarding and due diligence process, Promethean evaluates and selects its major business partners based upon criteria that include their compliance with human rights and ethical policies.

Promethean expects its business partners to exhibit behaviour in line with Promethean's Code of Ethics and Standards of Business Conduct, which is published on its website.

Where Promethean's role as a seller of goods and services, directly or via third parties, may associate it in any way with actual or perceived human rights violations, these must be referred to the relevant Regional Head of Sales in the first instance, or alternatively reported via the Whistle-blowing process outlined in 5 below.

### 5. RAISING CONCERNS AND SEEKING GUIDANCE

Employees and external parties are encouraged to raise concerns about any instance of malpractice, including abuse of human rights, at the earliest possible stage either through internal grievance procedures, or where deemed more appropriate, Promethean's confidential 'whistle-blowing' reporting line. Please refer to the Company's Whistle-blowing Policy and Procedure for further information.