

QBS'S ANTI SLAVERY AND ANTI HUMAN TRAFFICKING POLICY STATEMENT 2020

QBS Learning is committed to protecting Human Rights and prohibiting all acts of human trafficking, slavery, servitude, forced marriage, forced or compulsory labour, debt bondage, deceptive recruiting for labour or services, and child labour throughout the organization, its business and supply chain. Pursuant to the UK Modern Slavery Act 2015, QBS herein elucidates its initiatives to mitigate/eradicate modern slavery and human trafficking from its business and supply chain. This Statement sets out the steps that QBS as an organization has taken to ensure that no form of slavery and human trafficking exists in its business or supply chain.

ORGANISATION STRUCTURE

QBS Learning (www.qbslearning.com) is a leader in the education content development space focused on creating formal and informal educational products for children. The company works with clients to create 'innovative' products that work –help kids learn and teachers teach.

QBS BUSINESS

Our creative and innovative ability coupled with efficient execution has helped us build strong and successful relationships with major education institutions across the world. We have a strong brand presence and recognition across The United S, UK and India. Using a well-established global delivery methodology, we create world-class products. Over the years, QBS has built a reputation of providing high quality services and products to its clients and is committed to maintaining the highest quality benchmark within the industry.

SUPPLY CHAIN OVERVIEW

The supplier ecosystem of QBS can be broadly categorized into two heads – the 'primary supply chain' which means extended workforce involved in core delivery of Services and Solutions; and product or services suppliers or 'secondary supply chain' who provide materials, equipment and end products, business support services and facility management services for our operations.

POLICIES

QBS is committed on ensuring that the organization and its supply chain are free from modern slavery or human trafficking in any form. QBS's internal policies and practices focus on anti-slavery and anti-human trafficking and are part of a larger effort to ensure transparency, accountability and safeguarding of Human Rights extended to its supply chain. QBS has taken and continues to take multiple actions to identify and eradicate forced labour, slavery and human trafficking in its business and supply chain. QBS expects all those who work with and for it including without limitation, its personnel, supply chain and contractors, to read and comply with this Statement.

QBS's Supplier Code of Conduct specifically requires suppliers to ensure that their employees are hired on their own free will and that they must prohibit forced, bonded, or any other form of compulsory labour such as slavery or trafficking, transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services in all of their operations. At the time of recruitment, the Suppliers must provide a written employment

agreement containing terms and conditions of employment to all their employees. Suppliers and their agents must not confiscate any identity or immigration documents, such as government-issued identification cards, passports or work permits, unless required by law.

If suppliers do not comply with the Supplier Code of Conduct, or are found to have slavery or human trafficking in their business, or knowingly in their supply chain, QBS retains the right to terminate the contract for services with immediate effect and pursue legal remedies against the supplier concerned.

QBS also endeavours to foster an environment of open and honest communication. Suppliers are encouraged to raise concerns with respect to any suspected violations of this Code or any other specific concern arising out of their business relationship with QBS or its officers or employees to QBS's Ombudsperson.

ASSESSMENT OF MODERN SLAVERY RISK

QBS follows a risk-based assessment of its complex operation and supply chain. QBS understands that the population, location, industry / sector, type of products / services and categories of investments involved influence the level of such risk. QBS is committed to a continuous improvement approach that effectively respond to modern slavery risks. QBS has focused on assessing its supply chain in India. In addition to undertaking audits to ensure compliance with all labour laws by labour intensive suppliers in India, QBS has devised an additional questionnaire focused on modern slavery risks. All suppliers are required to report the steps being taken regarding identifying the risk of modern slavery within their supply chain which will allow QBS to better assess the potential risks of modern slavery in its own supply chain.

DUE DILIGENCE AND REMEDIATION PROCESSES AGAINST MODERN SLAVERY AND HUMAN TRAFFICKING

As part of its initiative to identify and eliminate any modern slavery, QBS –

- operates in licensed premises strategically limited in geographical scope to ensure optimum control and supervision of the work environment;
- strives to build long standing relationships with local suppliers and customers to effectively communicate its business standards;
- employs whistleblowing and grievance redressal systems to encourage reporting of concerns and/or violations;
- conducts independent assessments through third party tools and review the reports internally prior to the on boarding of any vendor/partner.

QBS's supplier engagement program integrates continuous evaluation, capacity building and risk management with a focus on Human Rights, labour practices like prevention of child labour and connected regulatory compliance through ongoing periodic assessments.

EFFECTIVENESS AND REPORTING

QBS encourages and has in place a whistleblowing process and a formal grievance redressal framework that enables everyone, including partners, contractors and employees, to raise their concerns at a single platform with complete confidentiality and has strict 'non-retaliation' policy to safeguard the interests of whistle-blowers.

ADHERENCE TO QBS'S VALUES

QBS is committed and continues to exhibit zero tolerance towards modern slavery and human trafficking in its business and supply chain. QBS expects its employees, supply chain personnel, contractors and all of those associated with it to adhere and comply with QBS's values. The legal and

compliance, human resources and central procurement organization are responsible for ensuring compliance across the organization.

TRAINING AND AWARENESS

QBS offers multiple mandatory trainings through various forums and workshops to its suppliers and employees on anti-slavery and anti-human trafficking, specifically to identify such issues in the supply chain and respond in accordance with the applicable laws. QBS's suppliers are also required to assess their businesses and supply chain to ensure compliance with the provisions of the Modern Slavery Act, anti-human trafficking and other Human Rights requirements as incorporated under this Statement.

An annual training and assessment is also held for all vendors and vendor employees. Aspects relating to Human Rights and Modern Slavery is covered in this training. Non-completion of this assessment within a stipulated timeline leads to the blockage of the web-based portal, hence requiring all vendor employees to mandatorily complete the training to enable access for updating attendance.

IMPACT OF COVID-19 ON QBS'S OPERATIONS AND SUPPLY CHAIN

QBS recognises that the Covid-19 pandemic would result in some workers becoming more vulnerable to modern slavery. QBS has taken multiple steps to protect vulnerable workers in their global operations and supply chains from the impacts of COVID-19.

As a response to COVID-19, QBS activated its strong Business Continuity Plan framework that enabled it to respond to the COVID-19 crisis with agility. 92.5% of our workforce are enabled to work from home and we continue to service our customers. Limited employees are working from campus and strong control measures have been put in place to ensure employee health and safety. Proper sanitization, availability of medical staff within the premises, appropriate social distancing has been implemented and is given utmost priority. QBS remains resolute in its goals of employee safety, business continuity and of being a trusted partner to our customers.

QBS's 'Digital- first' strategy has become particularly relevant in the post COVID-19 business environment and has enabled smooth functioning and effective delivery of services. QBS has continued to maintain supplier relationships and is fostering open communication with suppliers about COVID-19 risks. Even during the pandemic, we have seamlessly reached out to our suppliers reiterating our commitment to upholding of Human Rights and have sought confirmation from them on their continued compliance with our code of conduct policies.

This statement is in accordance with section 54(1) of the Modern Slavery Act 2015 constitutes QBS's modern slavery and human trafficking statement for the financial year 2020-21, as approved by the CEO.

Hanut Singh
CEO, QBS Learning