



# MODERN SLAVERY STATEMENT

## 1. INTRODUCTION

Pagoda is committed to improving our practices to combat slavery, human trafficking and exploitation. We recognise that slavery and human trafficking is a real yet hidden issue in our society. We will not tolerate slavery and human trafficking in our business or supply chain. 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 that any form of slavery is not taking place in our own business or supply chains.

Exploitation in this context means undermining or depriving a person of their liberty for commercial or personal gain and includes human trafficking, slavery, servitude, forced labour (including child labour), debt bondage, deceptive recruiting for labour or services and sexual exploitation, abuse or harassment.

## 2. OUR STRUCTURE & RELEVANT POLICIES

Our head office and parent company Pagoda Projects Ltd is based in the United Kingdom with a subsidiary office based in China, Intern China Ltd.

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Recruitment “Right to Work” Checks** - in order to check eligibility to work in the countries where we employ our team to safeguard against human trafficking or individuals being forced to work against their will.
- **Whistleblowing Policy** - our whistleblowing policy (part of the Employee Handbook) ensures that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal.
- **Health and Safety Policy** - this policy sets out our approach to ensure we provide a healthy working environment for our staff and contractors that work in or out of our premises as well as for the participants participating in Pagoda Programmes.

## 3. PAGODA'S COMMITMENT

1. All representatives of Pagoda and our partners, stakeholders and participants are committed to promoting awareness to identify any form of exploitation and agree to take appropriate action should it occur.
2. If a member of staff or stakeholder identifies that exploitation is occurring, or there is a risk it may occur, in an activity associated with performing duties in relation to Pagoda or otherwise, they are obligated to promptly notify their reporting line or a member of the leadership team of Pagoda Projects. To the extent it is within their control, all involved must take reasonable action to address the exploitation or risk of exploitation.
3. Pagoda commits to reviewing this policy with our stakeholders at regular intervals and affirming our commitment to it, whilst supporting others to follow best practices, raise awareness in the locations we operate and encourage the implementation of similar policies within our network and beyond.
4. Pagoda provides training to all new employees on the values included in its wider ethical and value-based approach to experiential learning, including in relation to combatting exploitation and modern slavery, and requires acknowledgement of these values when all contracts and third-party agreements are signed.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Pagoda's slavery and human trafficking statement for the current financial year.

*Verified by: Clare Harding, Compliance Director*  
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