

## 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 Seattle, USA. Promethean is a member of the NetDragon 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 DILIGENCE PROCESSES 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, and 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, and forced labour. 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 during a board meeting on 18<sup>th</sup> April 2019.

## **DIRECTOR**



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Signature of Director

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Ian Curtis  
Name of Director

Date: 21<sup>st</sup> May 2019