

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 EVP & Chief Human Resources Officer 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 EVP - 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.