



Anti-Slavery Policy

A) ORGANISATION

This statement applies to Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2023/2024

Registered Address - Fearless Adventures Suite 3, 1st Floor, Grove Chambers, Basecamp - 36
Green Lane, SK9 1LD

B) ORGANISATIONAL STRUCTURE

Grove Chambers is Head Quarters

The labour supplied to the Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp and pursuance of its operation is carried out in Grove chambers also remote and working from home.

No employee is required to travel overseas as part of their obligations and Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp activities is carried out wholly in the United Kingdom

DEFINITIONS

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restrictions placed on freedom of movement.

C) COMMITMENT

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp does not enter into business with any other organisation in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking, strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom

D) SUPPLY CHAINS

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp have a very limited supply chain including but not limited to;

- UK based stationary and office supply providers
- UK based Electronic Equipment suppliers
- Food and Beverage suppliers as part of our employee benefits.

E) POTENTIAL EXPOSURE

In general, Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

F) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp as it did for others across the nation.

Fearless Adventures Ltd and Fearless Adventures Academy Ltd welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Fearless Adventures Ltd and Fearless Adventures Academy Ltd concludes that the COVID-19 pandemic *did not* adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above. During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking. Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp took the decision from the outset of the pandemic to ensure that all of the workforce who were required to self-isolate in accordance with public health guidelines continued to receive full pay during their absence.

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

G) STEPS

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp has taken the following steps to ensure that modern slavery is not taking place:

- reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in its supply chains;
- undertaking impact assessments of its services upon potential instances of slavery;

- any actions taken to embed a zero tolerance policy towards modern slavery;

H) KEY PERFORMANCE INDICATORS

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp or its supply chains.

- Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp ensures all employees are paid 'The Living Wage' is set by the Living Wage Foundation. There is a UK rate and a London rate. The UK Living Wage is £9.50 an hour and the London Living Wage is £10.85 an hour for 2021/22. The Living Wage is based on the cost of living.

I) POLICIES AND TRAINING

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp has the following policies which further define its stance on modern slavery

- Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp abide by Safer Recruitment Vetting and Barring Policies
- Safeguarding training takes place for all members of staff and Safer Recruitment training takes place for those in positions of responsibility of hiring.

J) SLAVERY COMPLIANCE OFFICER

Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be

addressed, and who will then undertake relevant action with regard to Fearless Adventures Ltd and Fearless Adventures Academy Ltd trading as Basecamp obligations, in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.