



Modern Slavery and Human Trafficking Policy

September 2026

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Quality Leisure Management Ltd is a wholly owned subsidiary of PHSC Plc

PHSC plc

Purpose and scope

Quality Leisure Management Ltd (QLM) is committed to preventing modern slavery and human trafficking in its business activities and supply relationships. This policy sets out the standards QLM expects, the controls it applies and the arrangements for raising and responding to concerns.

The policy applies to QLM directors, employees, associate consultants, tutors, assessors, subcontractors, suppliers and other persons working for or on behalf of QLM. It also applies, where relevant, to the procurement and delivery of training, consultancy and associated services.

Legal and group framework

Modern slavery is a crime and a violation of fundamental human rights. QLM will act in accordance with applicable law, including the Modern Slavery Act 2015, and with relevant policies and governance arrangements of its parent company, PHSC plc.

Section 54 of the Modern Slavery Act 2015 requires certain commercial organisations to prepare a slavery and human trafficking statement for each financial year. Whether QLM is covered by a group statement or has a separate reporting obligation will be determined under the applicable legal and PHSC plc group arrangements. This policy operates whether or not QLM is independently required to publish an annual statement.

Definitions

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. It may involve the exploitation of a person through coercion, deception, threats, restriction of movement, abuse of vulnerability, debt, withholding documents or other means of control.

Human trafficking involves arranging or facilitating a person's travel with a view to exploitation. Exploitation may occur without movement across national borders.

A supply chain includes suppliers, subcontractors, labour providers and other organisations that provide goods or services directly or indirectly in support of QLM's activities.

Policy commitments

QLM has a zero-tolerance approach to modern slavery. QLM will act ethically and with integrity in its business relationships and will maintain proportionate systems and controls intended to prevent, identify and respond to modern slavery risks.

QLM will:

- not knowingly engage with any person or organisation involved in slavery, forced labour, trafficking or exploitation;
- expect suppliers, subcontractors and business partners to comply with applicable modern slavery law and to uphold equivalent ethical standards;
- consider modern slavery risks when appointing and reviewing suppliers or subcontractors;
- encourage prompt reporting of concerns and protect persons who raise genuine concerns in good faith;
- respond to concerns with the safety and welfare of potential victims as the priority;
- cooperate with PHSC plc, law-enforcement bodies and other competent authorities where appropriate; and

- review identified failures and take corrective action to reduce recurrence.

Risk assessment and due diligence

QLM will apply due diligence that is proportionate to the nature of the goods or services, the location and structure of the supply arrangement, use of temporary or subcontracted labour, the degree of QLM control, known sector risks and any information indicating exploitation or unethical labour practices.

Due diligence may include:

- obtaining information about the supplier or subcontractor and the services to be provided;
- confirming relevant policies, employment practices, licences or certifications where appropriate;
- requiring contractual commitments concerning lawful and ethical labour practices;
- considering the use of further subcontractors or labour providers;
- reviewing credible concerns, audit findings or adverse information;
- requesting corrective action and evidence of completion; and
- suspending or ending a relationship where serious concerns are not resolved.

Indicators of concern

Possible indicators may include workers appearing to be controlled by another person, restriction of movement, retention of identity documents, unexplained deductions or debt, wages paid to another person, threats, intimidation, unsafe or degrading accommodation, excessive working hours, inability to communicate freely, signs of coercion, or inconsistent accounts of employment arrangements.

An indicator does not by itself prove that modern slavery has occurred. Concerns should be reported and assessed rather than investigated informally by an untrained person where doing so could place anyone at risk or compromise evidence.

Training and awareness

QLM will provide information, guidance or training proportionate to the responsibilities and risks of relevant personnel. Persons involved in procurement, supplier management, course administration or supervision should understand how to identify and report possible concerns and must not take action that could increase risk to a potential victim.

Reporting a concern

Any person who believes or suspects that modern slavery may be occurring in QLM's activities or supply chain should raise the concern promptly with the Managing Director at admin@qlmconsulting.co.uk. Employees may also use QLM's whistleblowing arrangements where appropriate.

A concern should include, where safely available, the persons or organisations involved, the location, the nature and date of the concern, available evidence and any immediate risk. A person should not confront a suspected exploiter, attempt a rescue or place themselves or another person at additional risk.

Where there is an immediate danger or a crime is in progress, the emergency services should be contacted. QLM will consider referral to the police, the Modern Slavery and Exploitation Helpline, the

National Referral Mechanism or another competent authority as appropriate to the circumstances and legal responsibilities.

Response and escalation

The Managing Director will ensure that a reported concern is recorded, immediate risks are assessed, relevant evidence is preserved and any conflict of interest is managed. QLM will coordinate with PHSC plc where group oversight or action is required.

QLM's response may include obtaining specialist advice, supporting a potential victim to access appropriate assistance, notifying a competent authority, reviewing a supplier relationship, requiring corrective action, suspending activities or terminating a contract. QLM will not make promises of confidentiality or outcomes that it cannot lawfully guarantee.

Protection of persons raising concerns

QLM will support anyone who raises a genuine concern in good faith, even if the concern is not substantiated. No person should suffer detrimental treatment for making such a report or assisting an appropriate investigation. Knowingly false or malicious reports may be addressed under the relevant disciplinary or contractual procedure, but a report will not be treated as malicious merely because it is not upheld.

Confidentiality, safeguarding and data protection

Reports will be handled sensitively. Information will be shared only with those who need it to assess risk, protect a potential victim, investigate, take corrective action, meet a legal obligation or cooperate with a competent authority. Personal information will be stored securely and handled in accordance with QLM's data protection arrangements.

Where a concern involves a child or an adult at risk, QLM's Safeguarding Policy will also apply. Safeguarding or emergency action will not be delayed while responsibility for another procedure is determined.

Breaches and corrective action

A breach by an employee may result in disciplinary action. A breach by an associate, subcontractor, supplier or other business partner may result in remedial requirements, increased monitoring, suspension or termination of the relationship, and referral to an appropriate authority where required.

Where a failure or risk is identified, QLM will record proportionate corrective or preventive action. The record will identify the issue, affected activity or relationship, immediate containment, root cause where known, required action, responsible person, target date and verification of effectiveness.

Monitoring and organisational learning

QLM will review reported concerns, supplier issues, due-diligence findings, corrective actions and relevant PHSC plc information to identify recurring risks and opportunities to strengthen controls. Significant themes and actions will be considered through QLM's management review arrangements.

Responsibilities

The PHSC plc Board retains responsibilities arising under applicable group governance arrangements. The QLM Managing Director has day-to-day responsibility for implementing this policy, responding to concerns and ensuring that proportionate controls are maintained.

Directors and managers are responsible for ensuring that relevant personnel understand this policy and that concerns are escalated promptly. Employees, associates and subcontractors must comply with the policy, remain alert to indicators of exploitation and report concerns. Persons involved in procurement or supplier management must apply the required due diligence and record relevant decisions.

Policy review

This policy will be reviewed biannually and sooner where required by changes in legislation, PHSC plc arrangements, QLM activities or supply chains, identified risks, reported incidents or management review findings.

Signed:



Date: September 2026

Leigh Simmonds
Quality Leisure Management Ltd