

Modern Slavery Act Transparency Statement

Financial Year Ending 31 March 2026

Period Covered: 1 April 2025 - 31 March 2026

1. Introduction

Modern slavery and human trafficking are serious crimes and fundamental violations of human rights.

Anti-Slavery International defines slavery as a situation in which individuals are:

- Forced to work through mental or physical threat
- Owned or controlled through abuse
- Treated as commodities or bought and sold
- Physically constrained or restricted in their freedom of movement

The Modern Slavery Act 2015 further defines human trafficking as the recruitment, harbouring, or transportation of people into exploitation through violence, deception or coercion.

Findel Education Ltd recognises that modern slavery is a significant risk requiring robust oversight. We operate with a zero-tolerance approach and are committed to ensuring that all our business dealings are conducted ethically, transparently, and responsibly.

2. Group Structure

Findel Education Ltd is owned by Manutan. We are a multi-channel educational resources retailer serving both B2B and B2C markets. For more than 20 years, we have supplied UK and international schools with high-quality educational resources.

3. Operating Model

We are one of the UK's leading suppliers of educational resources.

We:

- Employ over 260 colleagues
- Offer more than 25,000 products, spanning early years through to higher education
- Operate through a portfolio of established, trusted brands

Findel Education Ltd supports the Ten Principles of the UN Global Compact (UNGC) across Human Rights, Labour, Environment, and Anti-Corruption.

Further information: <https://www.unglobalcompact.org/what-is-gc/participants/14320#company-information>

4. Sector Overview

Findel Education provides resources for three core areas:

- For the School
- Everyday essentials including stationery, office equipment, AV, janitorial, cookware and non-food catering supplies.
- For the Classroom
- A complete Primary and Early Years offering spanning curriculum resources, arts and crafts, furniture, and indoor/outdoor equipment.
- For the Specialist
- Products dedicated to Science, Sports, and Special Educational Needs.

5. Recruitment & Employee Wellbeing

Our recruitment activities follow Findel Education's Recruitment Policy and HR standards.

We:

- Obtain references for all new employees
- Conduct DBS checks where appropriate
- Provide a safe, healthy and supportive working environment
- Offer access to our Employee Assistance Programme for confidential support

We recognise the heightened risks associated with temporary warehouse labour. To mitigate these risks:

- We work exclusively with a reputable agency supplier
- Our supplier contract includes mandatory Modern Slavery Act compliance
- The agency is a member of the Gangmasters Licensing Authority
- We retain audit rights and monitor standards closely

6. Whistleblowing

Employees may raise concerns through the following channels:

- Line Manager
- Human Resources
- Confidential email: ethics@findel-education.co.uk
- Manutan Group's confidential whistleblowing helpline

7. Supply Chain

To support our commitment to the UNGC Labour Principles, we partner with third-party providers to conduct supply chain audits.

We are full members of SEDEX, which enhances transparency and enables alignment with the Ethical Trading Initiative (ETI) Base Code, which includes:

- Freely chosen employment
- Freedom of association
- Safe and hygienic working conditions
- No child labour
- Fair wages
- Reasonable working hours
- No discrimination or harsh treatment
- Protection of the environment

Supplier Requirements

Our policy states that:

- All new *direct suppliers* must complete a SEDEX SAQ and comply with the ETI Base Code
- All new intermediary suppliers must complete a SEDEX SAQ
- Suppliers in High-Risk Markets must provide a recent SMETA (or equivalent) audit
- Suppliers must sign Findel Education's Terms & Conditions, which include detailed expectations relating to modern slavery prevention
- We actively monitor global supply chain risks and act accordingly (e.g., no cotton from Xinjiang; no timber from Russia/Belarus)

8. Countries of Origin

Direct Sourcing:

UK, Hong Kong, China, Thailand, India, USA, France, Netherlands, Denmark, Slovakia, Poland, Spain, Italy, Ireland, Taiwan.

Through UK-based Importer/Intermediaries:

Australia, Bangladesh, Bulgaria, China, Cyprus, Egypt, Hong Kong, India, Indonesia, Israel, Japan, Malaysia, Mexico, Pakistan, Panama, Sri Lanka, Singapore, South Africa, USA, and EU countries (including Finland, France, Germany, Czech Republic, Denmark, Belgium, Hungary, Ireland, Italy, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland).

We recognise that modern slavery risks exist globally, including in traditionally low-risk countries. To mitigate this, we engage suppliers through workshops, ongoing monitoring, and tailored due diligence.

A significant proportion of our goods sourced from China are procured via Maxbright Industry Co. Ltd. Hong Kong, China (Findel's procurement partner), who require all suppliers to maintain up-to-date ethical compliance audits from recognised organisations.

9. Supply Chain Composition

Sourcing by declared country of origin:

- Europe (incl. UK): 59.56%
- Asia: 34.86%
- Middle East / North Africa / Greater Arabia: 1.40%
- North America: 1.27%
- South America: 0.07%
- Sub-Saharan Africa: 0.05%
- Australia & Oceania: 0.03%
- Central America & Caribbean: 0.02%
- Rest of World: 2.73%

10. Relationships With Third Parties

We maintain strong long-term relationships with the Union of Shop, Distribution and Allied Workers (USDW), representing warehouse operations colleagues at our Nottingham site.

11. Training

Modern slavery awareness is included in colleague onboarding and delivered through our digital learning platform (iHasco).

Additional detailed training on ethical sourcing and supply chain standards is provided to Buying, Merchandising, and Quality teams throughout the year.

12. Progress in 2025/26

- We became members of SEDEX in 2022 to strengthen alignment with the UNGC Principles and the ETI Base Code
- All new suppliers must hold SEDEX Supplier Membership and link with us on the platform
- High-risk market suppliers must maintain full, up-to-date third-party audits
- We have achieved 34% SAQ completion among existing suppliers, representing approximately 70% of total sales
- We are targeting 80% completion by the end of FY2026
- In 2024, we completed a comprehensive supply chain risk assessment, including ethical practices. No major concerns were identified
- Ongoing monitoring continues through our annual supplier evaluation process

Chris Mahady

Chief Executive Officer, Findel

Mark Whittaker

Chief Financial Officer / Deputy Managing Director, Findel