

## Modern Slavery and Human Trafficking Statement

We believe that all businesses with the Group have a responsibility to respect and protect the human rights of everyone involved in their operations, from internal teams to those across our wider supply chain. As part of the Transforming Learning Group (TLG), we are committed to acting ethically and transparently in everything we do.

Modern slavery, including forced labour, human trafficking, and servitude, has no place in any part of our business. While we operate exclusively in the UK and consider our direct risk of exposure to be low, we remain vigilant and proactive in identifying and mitigating any potential risk.

This statement outlines the steps we are taking to prevent modern slavery in our own operations and through our suppliers, in line with the requirements of the Modern Slavery Act 2015.

### Our Commitment

We are proud of the culture we have built across the businesses. One based on integrity, fairness, and respect. These values extend beyond our schools and teams, into how we work with suppliers and third parties. We are committed to ensuring:

- That no one working for or on behalf of the businesses is subject to slavery or forced labour.
- That our supply chains are engaged with ethically and transparently.
- That our policies, contracts, and processes reflect best practice in line with legal and ethical expectations.
- That staff and stakeholders are informed, trained, and empowered to speak up where concerns exist.

We understand that modern slavery can exist in many forms and can be hidden in even the most routine parts of operations, such as product sourcing or temporary staffing arrangements. That's why we continue to build checks and safeguards into our everyday practices.

### What This Means in Practice

Across our business, several practical steps help embed these commitments into the way we work:

- **Supplier due diligence:** All new suppliers are asked to confirm compliance with UK employment and anti-slavery legislation. Where relevant, we request copies of modern slavery statements or ethical sourcing policies. Suppliers are subject to an annual review where compliance against these standards is checked.
- **Ethical procurement:** Our internal procurement policy specifically addresses responsible sourcing. We actively avoid suppliers who operate in or source from high-risk regions without appropriate safeguards, and favour UK based or accredited vendors where possible.



- **Staff policies:** Our recruitment and people policies ensure that all team members are employed on fair terms, with the legal right to work in the UK. We do not tolerate any form of coercion and only use trusted recruitment partners.
- **Training and awareness:** Relevant staff, particularly those in procurement, leadership, and People and Culture receive modern slavery awareness training. We also promote awareness of key risks and red flags to the wider organisation through internal communications and onboarding.
- **Whistleblowing and reporting:** We have clear processes in place for reporting any concerns. All reports are taken seriously, treated confidentially, and followed up promptly

## Measuring Our Impact

We know that policy alone is not enough. That's why we monitor our efforts by tracking:

- Completion of staff training programmes on modern slavery.
- The number of suppliers screened or reviewed during onboarding.
- Any reported concerns, and the steps taken to address them.
- Our continued engagement with suppliers around ethical standards.

These insights help us improve year-on-year and inform our annual reviews of this policy.

## A Shared Responsibility

As we continue to grow - supporting more schools, hiring more staff, and working with more suppliers - we recognise that our responsibility also grows. Preventing modern slavery is not just about compliance; it's about maintaining a culture where people are valued, respected, and safe.

We will continue to work with our partners across the Group and beyond to share good practice and uphold the highest ethical standards. Whether in a school, at our office, or within our supplier base, we all have a role to play in ensuring that exploitation is never tolerated.

This statement is reviewed annually and approved by the Leadership team. It is published publicly in line with the Modern Slavery Act 2015, Section 54(7)