



ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

1st April 2022 to 31st March 2023 pursuant to the Modern Slavery Act 2015

1 POLICY STATEMENT

This Statement is made on behalf of Oxford International Education Group and all its subsidiaries and holding companies as detailed below in the Group Structure section. It covers the financial year 1st of April 2022 to 31st of March 2023.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Oxford International Education Group has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

Oxford International recognises that it has a responsibility to take a robust approach to slavery and human trafficking. This statement sets out the steps we have taken and will continue to take to ensure that slavery and human trafficking are not taking place anywhere in our own business or in any of our supply chains.

2 GROUP STRUCTURE

Oxford International Education Group (OIEG) is a provider of higher education and English language education programmes for international students that are delivered through face-to-face, digital and blended channels in the private education sector. OIEG has operations in the UK, Canada, North America, Hong Kong, China and India as well as having representatives in Saudi Arabia, Egypt, Bangladesh, Nigeria, Thailand, Kenya, Vietnam, Nepal, Korea, Malaysia, Indonesia, Pakistan, Russia Companies within the Group are:

- Sparrowhawk 1 Ltd
- Sparrowhawk 2 Ltd
- Sparrowhawk 3 Ltd
- Bradford International College Ltd
- JIC Partnership Ltd
- OIDI Ltd
- Oxford International Education and Travel Ltd
- Oxford International Education Group Services Ltd
- LIPC Partnership Ltd
- Beijing Pathways Education Consulting Company Ltd
- BIC Partnership Ltd
- ICD Partnership Ltd
- Greenwich International College Ltd
- Oxford International Worldwide Educational Services
- Bradford International College Ltd
- EXIMMMG Educational Consultants Private Ltd (India)
- Mohit Gambir Education Private Ltd (India)

- IES LLC (USA)
- Vancouver Maple Leaf Language Colleges Inc (Canada)
- East Coast School of Languages Ltd (Canada)

3 OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Oxford International acknowledges that slavery and human trafficking exist in many jurisdictions in which we operate and from which we procure goods or services. We are a higher education and training provider regulated by a number of accreditation bodies and our ongoing assessment is that we are at low risk of slavery or human trafficking occurring within our own business. This assessment is based on a number of factors including that our business is mainly comprised of permanently employed, skilled staff in a client focused service sector and are subject to regular scrutiny from our public sector partners and other UK regulatory bodies.

We have a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships to implement and enforce appropriate and effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains.

We have operational policies relevant to our approach to Modern Slavery and these are subject to Continuous review and development. These include our Anti-Slavery and Human Trafficking Policy, our Equality and Diversity Policy, our Health and Safety Policy, our Whistleblowing Policy and Our Supplier code of Conduct.

During the period we have introduced our Supplier Code of Conduct outlining our expectations of our suppliers around such topics as freedom of association, forced labour, underage labour, and wages and benefits.

4 STAFF

The majority of our staff are office based and all are employed on contracts that meet or exceed current employment legislation.

We engage a small number of contractor/consultants all of whom are provided with service agreements that have been reviewed by our legal advisors.

Where we use agencies to provide staff, we only use highly reputable providers.

We therefore believe that the risk of modern slavery occurring within our employee base is very low.

In the UK, OIEG is a Tier 2 A-rated sponsor for migrant workers.

5 OUR SUPPLY CHAINS

We have not identified any instance of either slavery or human trafficking occurring in our supply chain. However, we acknowledge that the education sector is considered at medium risk for modern slavery and human trafficking.

We do not have complicated supply chains with extensive sub-contracting. Our supply chains consist primarily of student recruitment agents, IT suppliers, transport providers (coach, ferry, rail and airline companies), schools and universities. We have undertaken a risk assessment of our suppliers and believe that the highest risk lies with our recruitment agents operating in certain

jurisdictions and our cleaning and leisure suppliers. As such we have strengthened our processes around these two types of suppliers and are continuing to closely monitor the situation.

Our student recruitment agents have to pass a rigorous due diligence process in order to partner with us and sign contracts whereby they are agreeing to comply with the Modern Slavery Act and other relevant legislation. In addition, educational agents are subject to rigorous scrutiny in relation to student recruitment selection and we have KPI's in place to ensure that students enrol on the courses they applied for and successfully complete their studies. We undertake annual reviews of agent performance and any irregularity is investigated and acted upon. This year we are rolling out a training programme for agents as part of their induction in order to familiarize them with the requirements of the Modern Slavery Act and other relevant legislation.

Oxford International is a Tier 4 Sponsor with the UKVI and complies with all UK immigration requirements in order to ensure that only genuine students are recruited to study on our courses.

Our other suppliers (IT, transport, cleaning etc) have been rigorously audited on appointment and are generally long-standing suppliers of the business with whom we have had a working relationship for many years.

This year we have introduced a new procurement process where suppliers are required to confirm adherence to our Supplier Code of Conduct prior to appointment. We are looking to roll out an annual declaration for large suppliers initially to help continually improve engagement with Modern Slavery.

Additionally, we have rolled out training on Modern Slavery to all permanent employees (this is a change of policy from last year when only employees who travel frequently in territories at risk of modern slavery were required to complete the training).

6 MEASURING EFFECTIVENESS- KEY PERFORMANCE INDICATORS

We continue as a business to focus on improving our methods of preventing slavery and trafficking. We have set out below some of the key steps we will be focusing on in the financial year to 5th April 2023.

a. Supplier Due Diligence KPIs

1. Develop our modern slavery risk assessment process, which we will pilot against a selection of our existing top 10 suppliers by spend in the past financial year, with a view to rolling the process out more widely across the Group in the financial year 22/23.
2. Raise awareness of our improved risk assessment process and programme across the Group.
3. Identify a selection of our highest risk suppliers to undertake an audit of their key policies, practices and procedures for tackling modern slavery and work with them where appropriate to help address any areas for improvement.

b. Training KPI's

4. Develop a training module for our international recruitment agents on the topic of modern slavery including what it is, how to identify and prevent it and our expectations in this area.
5. Achieve 95% completion of our training module on Modern Slavery amongst all our permanent and temporary staff.

7 COMMUNICATION AND TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, are providing appropriate training to all staff to raise awareness and ensure they and all staff know how to recognise red flags and raise concerns.

This policy has been made available to all staff across our jurisdictions as well as contractors via the Staff intranet and email.

All staff have been made aware of this policy and how to access it as part of their induction. This statement was approved by Tom De Clerck, Chief Finance Officer on 8 July 2022 on behalf of Sparrowhawk 1 Ltd and all its subsidiaries.

*Oxford International Anti-Slavery and Human Trafficking Policy 2022
Policy to be reviewed March 2023*