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Reviewed By:	WF JT Review 16/3/23

## MODERN SLAVERY POLICY 2023

### 1 INTRODUCTION

1.1 This policy sets out BARBRI's (the "Company") commitment to ensuring there is no modern slavery or human trafficking in their supply chains or in any part of the business. The Company adopted an Anti-Modern Slavery and Human Trafficking Policy in 2015. The Company is committed to acting with integrity in all their business relationships and to implement systems and controls that ensure human trafficking is not taking place anywhere in the supply chains.

### 2 ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

2.1 This statement covers the activities of the Company and its partners in delivering legal education solutions to students and clients across the globe.

2.2 The Company's ultimate parent company is Barbri Holdings Inc, which has its head office in the USA. The Company operates in the United Kingdom and has a turnover in excess of the statutory threshold. The Company is aware of its responsibility under the Act and is developing its framework to ensure its supply chain complies with the Act.

2.3 Management is responsible for ensuring employees understand and comply with this policy and are given adequate briefing and support on it, and the issue of modern slavery in supply chains.

### 3 THE COMPANY BUSINESS

3.1 The business is organised into the following business units:

3.1.1.1 Altior offers courses online and in a number of locations throughout the UK and provides professional on-site and bespoke training for many of the UK's largest businesses; and

3.1.1.2 Barbri Global, which provides test preparation and admissions support for professional licensure exams and similar assessments for legal professionals.

### 4 RELEVANT POLICIES

4.1 The Company has policies that assist in preventing slavery and human trafficking in its operations, including:

4.1.1.1 bribery and other corrupt behaviour: The Company has a strict anti-bribery and corruption policy in line with the Bribery Act (2010);

4.1.1.2 code of conduct: The Company's code of conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation; and

4.1.2 supplier terms & conditions: The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics, and a review of its terms & conditions will be undertaken in 2023 to ensure that suppliers are aware of their obligations under the Act and comply where necessary.

### 5 DUE DILIGENCE

5.1 Our supply chain includes student recruitment agents, IT suppliers, sub-contractors, and consultants for education services and venues.

5.2 We internally review our supply chain to evaluate risks and review aspects of the supply chain, including but not limited to safety, human trafficking, child labour, and other legal requirements to ensure they meet their regulatory obligations.

## **6 RECRUITMENT AND EMPLOYMENT PRACTICES**

6.1 The Company ensures that its workers are paid (minimum or living wage). The Company are confident that they have the appropriate mechanisms in place, to include supervision and management that would enable us to identify any issues in relation to modern slavery within the workforce. The Company will continue to monitor their teams to ensure all employees are treated fairly and with dignity.

## **7 TRAINING**

7.1 The Company will ensure that key team members undertake training on modern slavery, where deemed necessary, and will engage with external training providers, as appropriate.

## **8 AWARENESS RAISING**

8.1 The Company will continue to raise the awareness of the basic principles of the Modern Slavery Act 2015, including but not limited to:

8.1.1.1 how partners can identify and prevent slavery and human trafficking;

8.1.1.2 what employees can do to flag up potential slavery or human trafficking issues; and

8.1.2 what external help is available, for example, through the Modern Slavery Helpline.

## **9 COMMITMENT**

9.1 This statement will be reviewed with the Company's leadership and employees on an annual basis.

9.2 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 2023.

9.3 The prevention, detection and reporting of modern slavery in any part of the Company or supply chain is the responsibility of all employees. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

9.4 If an individual suspects a breach of this policy has occurred or may occur in the future, they must notify their manager or the Head of Operations immediately. The person should take a detailed account of all and any behaviour or activity that raised their suspicions. If the suspicious are reasonable, management are encouraged to report the breach to the police.

## **10 MODERN SLAVERY HELPLINE**

10.1 Any individual with a suspicion that modern slavery is occurring can call the modern slavery helpline 0800 0121 700.