

EDU UK TopCo Limited (trading as Study Group)

Modern Slavery and Human Trafficking Statement

EDU UK TopCo Limited is a holding company within the wider Study Group group of companies, a global leader in preparing students for international academic success and rewarding careers through a transforming learning experience. EDU UK TopCo Limited's subsidiaries include EDU UK Intermediate Limited, Study Group UK Limited and Bellerbys Educational Service Limited. For the purposes of this statement, EDU UK TopCo Limited and its subsidiaries are referred to collectively as 'Study Group'.

Study Group operates an international boarding school under the name 'Bellerbys College' at locations in Brighton, Cambridge and London and also partners with leading universities across the UK. The wider group operates elsewhere in Europe, North America and Australasia. Our colleges nurture ambitious students from diverse academic backgrounds and prepare them for success at their chosen university. We provide on and off-campus education through International Study Centres in partnership with universities. Our pathway programmes provide the language, academic and social skills that students need to progress to university progression.

The education sector is not considered one most at risk in terms of modern slavery and Study Group's business contains no intricate supply chains or multiple levels of contracting and sub-contracting. Notwithstanding, Study Group maintains a position of zero-tolerance in relation to matters of slavery and human trafficking within any part of its business operations and takes a risk-based approach regarding its supply chains. Our supply chains consist primarily of student recruitment agents, IT suppliers and estates/facilities management services. We expect all those in our supply chains to comply with our values and all contracts with business partners require prior approval in accordance with our delegation of authority process. Selective and proportionate due diligence is also carried out on new business partners and, where appropriate, our standard contracts have been amended to include an obligation on parties to comply with the provisions of the Modern Slavery Act 2015. We expect any entity with which we do business to have suitable anti-slavery policies and processes in place.

All Study Group employees have the necessary documentation to prove they are legally entitled to work in the country of their employment and no one under the legal minimum age for admission to work is employed. We also have a Whistleblowing Policy that encourages the reporting of wrongdoing, including violations of human rights such as modern slavery or human trafficking. All reports will be investigated thoroughly and appropriate remedial actions taken.

Training about slavery and human trafficking is also available for all employees and contractors of Study Group and employees of other Study Group entities who are based in the UK.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Study Group's slavery and human trafficking statement for the financial year ended 31 December 2018. It was approved by the board of EDU UK TopCo Limited on 27 June 2019 and will be reviewed at least once annually.

Signed on behalf of EDU UK TopCo Limited



Emma Lancaster

Title: Chief Executive Officer

Date: 27 June 2019



studygroup.com

Study Group UK Limited Registered in England, number 31020
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