

# Modern Slavery Statement

## Slavery and Human Trafficking Statement for the Financial Year ending 2022

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by BPP Holdings Limited and its group of companies, during the financial year ending 31<sup>st</sup> August 2022, to prevent modern slavery and human trafficking in its business and supply chains.

### Who are we?

BPP Holdings Limited is the parent company of the BPP Professional Education Group. This statement covers the steps taken by BPP Holdings Limited and the following companies within the BPP Professional Education Group: BPP University Limited, BPP Professional Education Limited, BPP Learning Media Limited, BPP Actuarial Education Limited, Actuarial Education Company Limited, BPP Services Limited and BPP International Limited (“**BPP**”).

BPP provides higher education, professional education, apprenticeships and learning materials to a global community of students and corporations.

### Our Growing Business

During the financial year ending 2022, BPP made two acquisitions as part of its business plan.

In October 2021, BPP purchased Estio Training Limited and Estio Technology Recruitment Limited (“**Estio**”). Estio is a specialist provider of digital and technology apprenticeships.

In June 2022, BPP Purchased Firebrand Training Limited and its subsidiaries (“**Firebrand**”). Firebrand specialise in IT bootcamps, apprenticeships and commercial training.

Although neither Estio or Firebrand meet the reporting threshold under the Modern Slavery Act 2015, BPP is committed to ensuring that Estio and Firebrand meet BPP’s commitment to ethical business practices. Accordingly, as part of its integration strategy, BPP will ensure that both Estio and Firebrand meet the commitments set out in this statement and will produce an updated statement including their achievements in BPP’s statement for the financial year ending 2023.

### Our Commitment

BPP is committed to and supports international efforts to promote ethical business practices and policies related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking. In our [Code of Business Ethics](#), we acknowledge responsibility under the Modern Slavery Act 2015 and will endeavour to ensure that slavery and human trafficking are not taking place within our directly employed workforce, or our supply chain.

## **Anti-Slavery and Human Trafficking Policy**

BPP operates an Anti-Slavery and Human Trafficking Policy (the “**Policy**”) which sets out BPP’s responsibilities (and the responsibilities of those working for and on behalf of BPP) in observing and upholding our position on preventing modern slavery. The Policy also provides guidance on how to report concerns about any issue or suspicion of modern slavery.

### **Due diligence processes for slavery and human trafficking**

Modern slavery is included within our supplier on-boarding risk assessment and due diligence procedures. In addition, our standard supplier contractual terms include obligations on suppliers to comply with the Modern Slavery Act 2015.

### **Whistleblowing Policy**

We operate a Whistleblowing Policy, aimed principally at our employees but also available to our suppliers that encourages the reporting of any wrongdoing which extends to human rights violations like modern slavery. All reports are fully investigated and appropriate remedial actions taken. Metrics relating to whistleblowing activity are internally reviewed.

### **Training**

BPP provides training to all new employees on the values included in its Code of Business Ethics and receives acknowledgement of the Code from its freelancers and suppliers.

As at the date of this statement, we can confirm that there have been no reported incidents of human trafficking or modern slavery within BPP or its supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BPP’s slavery and human trafficking statement for the financial year ending 31st August 2022. This statement has been approved by the board of directors of BPP Holdings Limited on 28 February 2023.

Graham Gaddes

Chief Executive Officer

Approved and signed on 28 February 2023