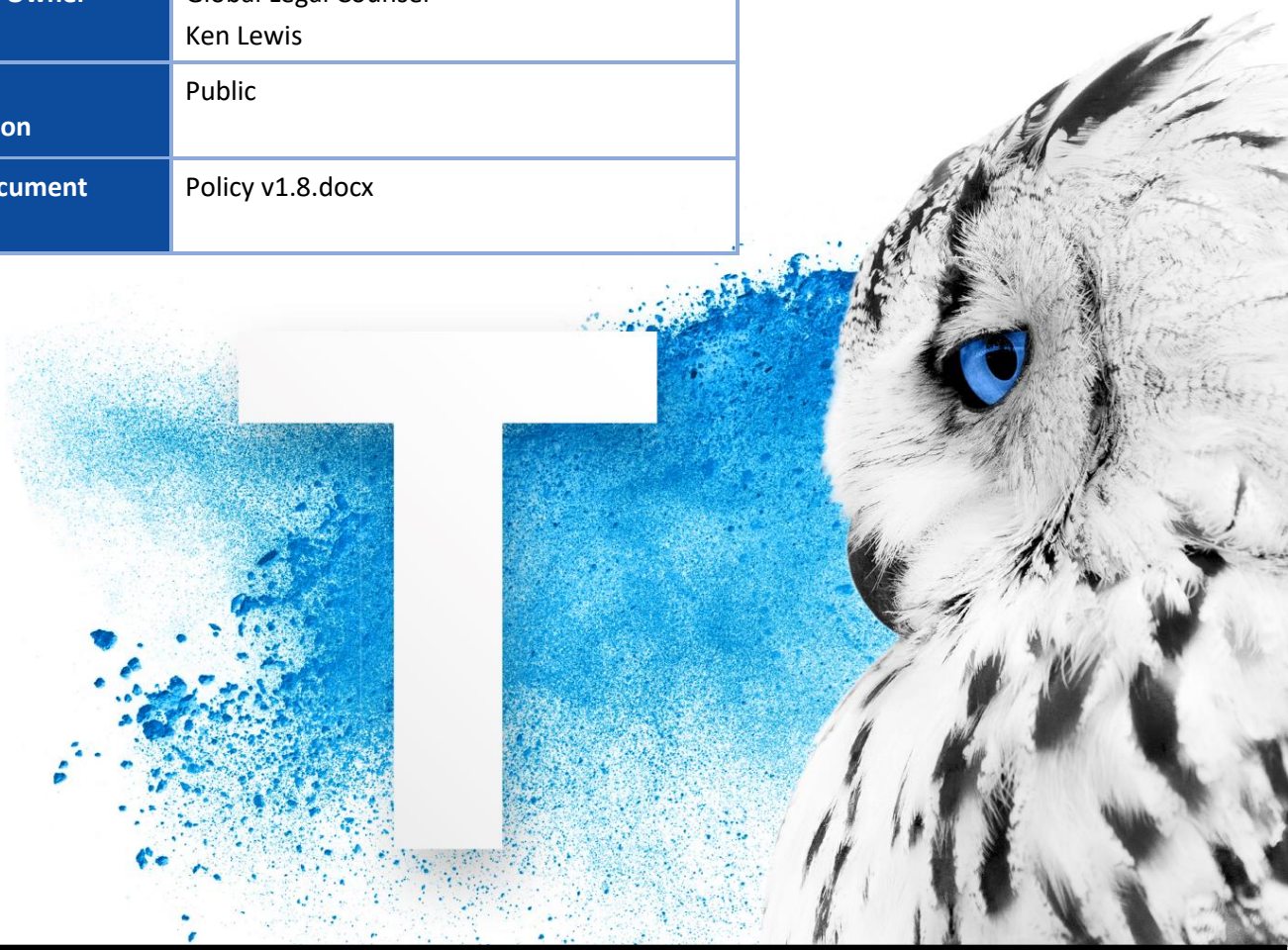
Tribal Group plc

Modern Slavery Statement

August 2024

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1 Introduction

As a leading global provider of education software and services Tribal is committed to the highest standards of professionalism, transparent and ethical behaviour, and integrity, throughout its entire business and contributing to the wellbeing of communities around the world. We have a zero-tolerance approach to human rights abuses. We take seriously our responsibility in the protection of fundamental human rights and the elimination of modern slavery by ensuring that slavery, human trafficking and child labour has no place anywhere in our business, including our supply chains. We promote a safe, diverse, and enjoyable workplace that fosters equal opportunities for all. Our Dignity at Work and Ethics Policies underpin our entire business, including our dealings with third parties, to ensure we build appropriate and inclusive relationships. We expect any third parties with whom we do business as part of our supply chain to adhere to the same transparent and ethical behaviours.

This is Tribal Group plc's ("**Tribal**") Modern Slavery Statement for the financial year ended 31 December 2023 and is current as of 04/09/2024.

2 Our Business and Organisational Structure

Tribal provides a wide range of products and services that support the delivery of education services around the world, including the development and implementation of software, supporting adult learning and careers development, and providing schools inspections and improvement services. As a world-class company, our mission is to empower the world of education. Our customers value and benefit from our expertise, software, and services to assist with student enrolment, assessment and reporting obligations. These core functions underpin student success.

Tribal's business model is principally the development, licence, implementation, hosting and support of its own software products. It also conducts quality assurance audits of educational institutions, undertakes surveys and research of educational institutions, and produces benchmark reports based on its industry knowledge and expertise.

We operate in the UK, Europe, Australia, New Zealand, Canada, United States, Middle East and South East Asia. Tribal's group trading entities are detailed in the appended Corporate Entities Table below.

3 Our Supply Chains and Their Adherence to Our Values

With customers, suppliers, sub-contractors, associates, and employees based within and outside the United Kingdom, Tribal recognises the need to ensure compliance with the provisions of the Modern Slavery Act 2015 Act in the United Kingdom, as well as the relevant laws of the jurisdictions in which we operate.

Tribal's supply chain consists of goods and services procured to enable our people to deliver our products and services. Tribal's supply chain comprise mainly human resources who perform skilled services, whether they be employees, sub-contractors, associates, or agents. Tribal also sources software from third parties to facilitate the production of its own services or incorporate into its products. Our supply chain also includes property, facilities management, human resources, information technology and marketing.

The majority of Tribal's supply chain is based in low-risk countries where forms of modern slavery are not prevalent.

Our anti modern slavery strategy and diligence processes are developed and reviewed by a cross functional Global Governance Group which includes representatives from Finance, Legal, GRC, Property, and Human

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Resources. We have an externally audited Global Supplier Management Framework to ensure consistent supplier management throughout the organisation. This includes ensuring that our supply chain is robust and ethical, and that modern slavery or human trafficking is not taking place within our supply chains. Tribal's due diligence processes have been tightened in relation to review, negotiation, and approval of commercial contracts. Tribal has redrafted its Delegation of Authority Policy ("**DOA Policy"**) which is reviewed annually, or more frequently, if required. The DOA Policy provides the governance framework for the review and approval of Tribal's contracts with its customers and suppliers. Tribal's Global Legal Team is responsible for reviewing and negotiating contracts and approvals for contracts are in accordance with the DOA and managed via a Contract Management System. These steps help to ensure that all contracts are reviewed for compliance with all Tribal governance policies, including its Global Supplier Management Framework And that the contracts we enter into through our subsidiaries contain provisions that conform with the Act or relevant laws of the jurisdictions in which we operate.

4 Our Policies in Relation to Slavery and Human Trafficking

Our policy framework includes a range of people and procurement policies that outline Tribal's zero-tolerance approach to modern slavery and its commitment to preventing slavery and human trafficking risks in its business activities. Tribal is also committed to ensuring there is transparency in its activities and its approach to tackling modern slavery throughout our supply chains, consistent with the disclosure obligations of the Modern Slavery Act 2015 and the laws of the jurisdictions in which we operate.

Tribal's relevant policies include:

- Global Supplier Management Framework – sets out the framework to ensure that modern slavery and human trafficking are not taking place within our supply chain. This includes the steps that must be taken to monitor and manage risk throughout the procurement and supplier management journey and including provisions to terminate supplier contracts in appropriate circumstances.
- Dignity at Work Policy - sets out Tribal's commitment to creating a workplace environment which is free from hostility and any kind of bullying and harassment. It commits to all individuals being treated with dignity and respect, and providing a safe, supportive and welcoming environment for all.
- Equality, Diversity and Inclusion Policy – sets out that we encourage a diverse workforce and aim to provide a working environment where employees at all levels are valued and respected, and where discrimination, victimisation, , promotion of negative stereotyping and harassment are not tolerated.
- Grievance Policy - sets out that we believe that all employees should be treated fairly and with respect, and that we encourage open dialogue to ensure that questions and problems relating to employment can be freely discussed and resolved.
- Dealing with Family & Domestic Violence at Work Policy – sets out Tribal's commitment to supporting employees through situations where they are faced with violence or abuse in their personal life.
- Anti-Bribery and Corruption Policy – sets out Tribal's rules and what is expected of our employees, contractors and third parties in all dealings on our behalf.
- Ethics Policy – sets out the foundation of Tribal's values which is non-negotiable in everything we do.
- Delegation of Authority Policy – sets the matrix of approvals required for all contracts/transactions undertaken by Tribal, including those affecting our supply chain. This was updated in February 2023.
- Risk Management Framework – sets out Tribal's approach to the identification, assessment, treatment, mitigation and reporting of risks in relation to Tribal's assets and supply chain.
- Sustainable Procurement Statement – sets out our aims and objectives to procuring goods and services in order to comply with our legal, governance, moral and ethical duties and to ensure sustainability throughout the supply chain.

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- Whistleblowing Policy – offers individuals a confidential mechanism for disclosing suspicions or knowledge of possible impropriety to protect Tribal, its brand, people and customers by delivering an early warning when something goes wrong.
- Wellbeing at Work Policy – sets out Tribal's approach to managing and supporting the wellbeing of our employees at work.
- Young and Vulnerable Persons Policy – sets out Tribal's commitment when young or vulnerable adults undertake work for Tribal.
- Anti-Tax Evasion Policy – sets out Tribal's commitment that it will not engage in tax evasion or the facilitation of tax evasion and articulates the role and responsibility all our people have in preventing tax evasion and its facilitation. Where appropriate, suppliers are required to adopt the same standard of conduct when acting on Tribal's behalf.

All of these policies have been made available to all of our people via our intranet.

Tribal complies with all applicable employment law relating to employee terms and conditions, including pay and ensuring compliance with applicable minimum wage legislation.

Our Wellbeing at Work Policy re-enforces Tribal's commitment to addressing health and wellbeing of our people and we continue to maintain significant enhancements in our approach to the health and wellbeing of our people. Through our Employee Assistance Programme we have introduced global access to a Wellbeing Support service for all employees where they can access a qualified counsellor and benefit from up to six face-to-face counselling sessions to help with issues such as depression, child support, bereavement, anxiety and panic attacks, stress, dealing with conflict and relationships. Support is also provided for Financial Wellbeing and Physical Wellbeing.

Other initiatives include a refreshed flexible working policy, tailored programmes to help our people navigate the stresses and anxieties of global events, and additional support such as home workstation assessments by ergonomic specialists. This support is offered to all our people.

5 Strategy and Supply Chain Due Diligence

Tribal expects our suppliers to adopt the same high standards that Tribal has to modern slavery and human trafficking. This includes fair employment practices. Our policy framework reflects these standards, and we share these with our suppliers.

Tribal's Global Supplier Management Framework, which is reviewed and updated at least annually, outlines the following steps to ensure modern slavery or human trafficking is not taking place within our supply chains:

- High risk locations identified.
- Supplier research must be conducted before entering into any agreement.
- Slavery and Human Trafficking statements must be requested from all suppliers.
- Contractors engaged by Tribal are requested to confirm that they pay the national minimum wage to their staff.
- Supply chain mapping must be undertaken.
- Completion of regular employee training to raise awareness.

Tribal requests information from prospective suppliers to ensure that they meet certain criteria including (but not limited to): Health and Safety; International Organization for Standardization ("ISO") certifications; insurances; equality and diversity and environmental policies; policies evidencing compliance with the terms of the Act. These criteria are used as part of the process to select suppliers and we request updated versions

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of these key documents/certifications on an annual basis. The specific question we ask is: *What steps does your company take to ensure compliance with the Modern Slavery Act 2015?*

The fundamental objective is to enable Tribal to identify and mitigate or avoid potential risks throughout the supplier engagement lifecycle from on-boarding through to performance improvement. This process is evergreen as we develop enhanced visibility across our supply chain, regularly review our data sets and risk register and ensure continuous improvement of our supply chain and modern slavery risk management.

6 Risk Assessment and Management

The primary process to enable identification and assessment of risk of modern slavery throughout our supply chain is through application of the Global Supplier Management Framework. It is based on evidence gathering from suppliers and application of our Risk Management Framework. This is undertaken pre-engagement of a supplier and during the lifecycle, including on review – refer to Section 5.

Tribal recognises that in order to manage its compliance with the Act, especially throughout its non-UK operations, it is essential to have and to maintain appropriate processes which identify and mitigate related risk.

The cornerstone for Tribal has been raising awareness of slavery and human trafficking and identifying any processes we can implement to identify any unusual business behaviour. As with any risk management system, this is a continuing process.

The Board of Directors and senior management recognise that their support of all governance policies is an essential requirement to foster a positive and appropriate behaviour within the organisation. This approach also influences suppliers and subcontractors, particularly when risk assessment of their operations is undertaken comprehensively.

7 Reporting

Our cross functional Global Governance Group receives written monthly reports from all relevant functional areas. It holds monthly meetings to measure the effectiveness of our strategy and adherence to our policy framework, including the Global Supplier Management Framework. Where improvements are identified then these are reviewed and approved by the Global Governance Group.

The Global Governance Group reports to the Board of Directors monthly and includes reporting on compliance with modern slavery obligations.

8 Monitoring and Performance Indicators and ongoing enhancements

Our organisation is committed to the ongoing evaluation and enhancement of our policies and practices. The Global Governance Group uses key performance indicators to measure Tribal's effectiveness in tackling modern slavery and human trafficking within the business and its supply chain:

- Measuring minimum labour standards required of Tribal, its subsidiaries and suppliers, globally and how these align to industry standards.
- Whether when contracting with a new supplier or customer or renewing a contract with an existing customer, sufficient and appropriate information regarding compliance with the Act has been provided; and
- The measures to be taken if suspicious activity has been identified in Tribal's supply chain.

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9 Reporting Concerns

Tribal promotes an open and inclusive culture where any member of staff is encouraged to speak openly and freely (and confidentially if preferred). Reporting lines do not apply in these circumstances. The key reporting mechanisms which staff can avail themselves of is our Whistleblowing Policy, which is a confidential way for staff to disclose suspicions of impropriety or wrongdoing – a report can be anonymous. A concern related to modern slavery can be made via this process.

Staff are also encouraged to discuss any matter or concern with their managers or supervisors or Human Resources at any time.

10 Training

Tribal operates an annual programme of corporate compliance training which is mandatory for all employees. This includes training on the Modern Slavery and Human Trafficking Act and includes how we comply with our responsibilities under it and being aware of issues that the Act is intended to address such as:

- detecting and reporting human trafficking
- the ability of an individual to choose employment
- a safe working environment; prohibition on use of child labour
- non-discrimination
- that no harsh or inhuman treatment is allowed in the workplace.

11 Board Approval

Tribal Group plc's board adopted this statement on xx/xx/xx.



Diane McIntyre
Board Director and Chief Financial Officer

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Appendix A - Tribal Group plc and its Corporate Entities Table

Entity Name	Country	Company / Branch
Tribal Group PLC	UK	Company
Tribal Education Ltd	UK	Company
Tribal Holdings Limited	UK	Company
Empowering Education International Limited	UK	Company
International Graduate Insight Group Ltd	UK	Company
Tribal Dynamics Limited	UK	Company
Tribal Dynamics Holdings Limited	UK	Company
Empowering Education International Limited Educational Consultancy - L.L.C - O.P.C	UAE	Company
Tribal Education Ltd (Abu Dhabi Branch)	Abu Dhabi	Branch
Tribal Middle East W.L.L	Bahrain	Company
Semestry Limited	Scotland	Company
Semestry Netherlands BV	Netherlands	Company
Class Measures Limited (Dormant)	UK	Company
Tribal Arabia Co For Business Services LLC	Saudi Arabia	Company
Tribal Group Pty Ltd	Australia	Company
Tribal Group Pty Ltd (Singapore Branch)	Singapore	Company
Callista Software Services Pty Ltd	Australia	Company
Human Edge Software Corporation Pty Ltd (trading as SchoolEdge)	Australia	Company
Tribal Campus Pty Ltd	Australia	Company
Empowering Education Australia Pty Ltd	Australia	Company
Tribal Education Ltd (New Zealand Branch)	New Zealand	Branch
Empowering Education New Zealand Limited	New Zealand	Company
Tribal Group (Malaysia) SDN BHD	Malaysia	Company
Tribal Software Philippines, Inc	Philippines	Company
Tribal Systems Canada Ltd.	Canada	Company
Class Measures Inc	USA	Company

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12 Mandatory Document Controls

Approval

Document approved by Exec Member	Diane McIntyre, Chief Financial Officer	31 July 2024
Document approved by GGG (or Sub Group) if required	Global Governance Group	1 August 2024
Document approved by PLC Board (or Sub-Committee) if required	Plc Board	4 September 2024
Review Requirement	Annual	**or sooner if required**

Document History

Version Number	Date	Comments	Created, reviewed or updated by
V1.02	23/06/2021	First version	Rachel Hood – Property Manager
V1.03	24/05/2022	Annual Review - Amended into new document template, Minor amends to bring up to date e.g., change of dates from 2021 to 2022 and updates to Entities table.	Rachel Hood – Property Manager
V2.00	21/06/2022	Full policy review and update. Policy restructured and redrafted.	Ken Lewis – Global Legal Counsel
V3.0	12/07/2023	Annual review - Amended into new document template Minor amendments to bring up to date e.g., change of dates from 2022 to 2023 Updates to Section 3: Objectives of the DOA policy and the Global Legal team's responsibility. Minor updates to Section 4 and the Appendix A - Entities table.	
V4.0	17/07/2024 29/07/2024	Annual review - Amended into new document template. Minor amendments to bring up to date e.g., changes of dates from 2023 to 2024.	Ken Lewis, Global Legal Counsel, Rachel Webber, Deputy General Counsel, Rachel Hood, Head of Property

Contact Details

All proposals for amendments to this document should be addressed to the following:

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