

Tribal Group plc

Modern Slavery Statement

July 2022

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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 2021 and is current as of 04 July 2022.

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 products and services. Tribal's supply chains 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 incorporated 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 group, Global Governance Group, which includes representatives from Finance, Legal, GRC, Property, Human Resources. In the last 12 months we have developed and refined a Global Supplier Management Framework to ensure consistency across the organisation and that the supply chain is robust, ethical and ensure 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. This requires all contracts to be reviewed, negotiated, and signed off by the Global Legal Team and the Global Finance Team. These steps help to ensure that all contracts are reviewed for compliance with all Tribal governance policies, including its Global Supplier Management Framework. These steps help ensure 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, harassment, victimisation or discrimination. It commits to all individuals being treated with dignity and respect, providing opportunities on a non-discriminatory basis 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, bullying, promotion of negative stereotyping and harassment are not tolerated.
- 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 December 2021.
- 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.
- 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 on 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. The impacts of the global pandemic have resulted in significant enhancements to our approach to the health and wellbeing of our people. Through our Employee Assistance Programme we have introduced access for all employees globally to a Wellbeing Support service 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 included a refreshed flexible working policy, tailored programmes to help our people navigate the stresses and anxieties of lockdown, and additional support such as home workstation assessments by ergonomic specialists. This support was offered to all our people. Throughout the pandemic we communicated regularly with our employees and obtained their feedback on the new challenges faced by them, which informed the development and enhancement of our health and wellbeing resources offered.

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 was substantially updated during the year, 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 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

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.

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:

- Whistleblowing: 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.

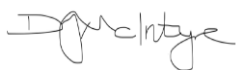
Staff are also encouraged to discuss any matter or concern with their managers or supervisors or Human Resources at any time.

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; and that no harsh or inhuman treatment is allowed in the workplace.

11 Board Approval

Tribal Group plc's board approved this statement on 4th July 2022.



Diane McIntyre
Board Director and Chief Financial Officer

Appendix A - Tribal Group plc and its Corporate Entities Table

Entity Name	Country	Company/Branch
Tribal Group Plc	UK	Company
Tribal Education Limited	UK	Company
Tribal Education Limited (New Zealand Branch)	New Zealand	Branch
Class Measures Limited	UK	Company
Class Measures Inc.	USA	Company
Tribal Education Limited (Abu Dhabi Branch)	Abu Dhabi	Branch
Tribal Education Inc.	USA	Company
Tribal Middle East W.L.L. Limited	Bahrain	Company
Tribal Systems Canada Limited	Canada	Company
International Graduate Insight Group Limited	UK	Company
Human Edge Software Philippines Inc	Philippines	Company
Tribal Group Pty Limited	Australia	Company
Tribal Group Pty Ltd (Singapore Branch)	Singapore	Branch
Human Edge Software Corporation Limited Pty	Australia	Company
Tribal Campus Pty Limited	Australia	Company
Callista Software Services Pty Limited	Australia	Company
Tribal Group (Malaysia) Sdn Bhd	Malaysia	Company
Tribal Group Asset Company Pty Limited	Australia	Company
Tribal Dynamics Ltd	UK	Company
Tribal Dynamics Holdings Limited	UK	Company
Semestry Limited	UK	Company
Semestry Netherlands BV	Netherlands	Company

12 Mandatory Document Controls

Approval

Document approved by Exec Member	Diane McIntyre, Chief Financial Officer	21 June 2022
Document approved by GGG (or Sub Group) if required	Global Governance Group	21 June 2022
Document approved by PLC Board (or Sub-Committee) if required	ESG Committee	23 June 2022
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

Contact Details

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

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