Modern Slavery Act – Supplier Code of Conduct

Introduction

1 The Group's commitment: Cavendish Education Group is committed to respecting human rights, safeguarding children and adults at risk, and preventing modern slavery in its operations and supply chains. This Code supports a risk-based approach to procurement and contract management and should be read with the Group Modern Slavery and Human Trafficking Policy and applicable contract terms.

We are passionate about excellence and committed to complying with the highest standards of ethical and professional behaviour.

2 Commitment from others: We expect suppliers to comply with this Code, applicable law and any higher contractual standard. Suppliers must identify, prevent, mitigate and remediate modern-slavery risks proportionately, cooperate transparently and continuously improve. Compliance with this Code does not remove a supplier's own legal duties.

3 Application: This Code applies to every supplier of goods or services to, or person working for or on behalf of, any Cavendish Education Group member, including contractors, labour providers, agents, consultants, seconded workers, third-party representatives and business partners (collectively, 'suppliers'). Suppliers must apply equivalent, risk-based requirements to relevant subsidiaries, subcontractors, recruitment agents and other supply-chain participants used to deliver Group contracts.

Legal compliance

4 Requirement of suppliers: Suppliers must comply with all applicable legal and regulatory requirements and act transparently, ethically and with integrity. They must maintain proportionate governance, policies, risk assessment, due diligence, training, worker-engagement, reporting, monitoring and remediation controls addressing slavery, servitude, forced or compulsory labour, human trafficking and related exploitation. A supplier within section 54 of the Modern Slavery Act 2015 must produce an annual statement approved, signed and published as the Act requires and

provide it to the Group on request.

Employment practices

5 Equal opportunities, dignity and respect: Every Group member is committed to dignity, respect, equality and safeguarding. For this Code, 'workers' includes employees and other persons performing work, while pupils and students are protected through the Group's safeguarding arrangements. The Group opposes discrimination on any grounds. The Cavendish Education Group is committed to equal opportunities and will take every possible step to ensure that its staff are treated equally and fairly. All policies and practices will conform to the principle of equal opportunities in terms of recruitment, selection, training, promotion, career development, discipline, redundancy and dismissal.

6 Employment and recruitment standards: Suppliers must comply with applicable employment, equality, immigration, wage, working-time, freedom-of-association and health-and-safety law. Work must be freely chosen. Suppliers must not use forced, bonded, compulsory, prison or trafficked labour; charge workers recruitment fees or related costs; retain passports or identity documents; withhold wages unlawfully; restrict movement; use threats, coercion, deception or abuse of vulnerability; or employ children contrary to applicable minimum-age and hazardous-work rules. Workers must receive understandable terms, lawful pay and access to their documents and must be free to leave employment subject to lawful notice.

Whistleblowing and grievances

7 Worker voice, whistleblowing and grievances: Suppliers must provide accessible, confidential and, where practicable, anonymous channels through which workers and other people can raise concerns or grievances in a language and format they understand. Reports must be assessed promptly and fairly, with no retaliation. Channels must be available to agency, migrant and subcontracted workers and must not prevent reports to the Group, regulators, law enforcement, trade unions or other lawful bodies. Suppliers must publicise the channels and retain evidence of outcomes and remedy.

Supplier business practices

8 Ethical conduct and transparency: Suppliers, subcontractors and business partners must conduct themselves lawfully and ethically, provide accurate information, disclose material modern-slavery risks or incidents and avoid concealment. Protection of the Group's reputation must never be used to suppress a genuine concern, discourage worker participation or prioritise confidentiality over victim safety and lawful reporting.

9 Data protection: Suppliers must comply with applicable data-protection law, including the UK GDPR and Data Protection Act 2018 where applicable, and implement appropriate confidentiality, access, retention and security controls. Personal data gathered through screening, audits, worker interviews or incident

response must be limited to what is necessary, handled lawfully and protected from disclosure to suspected exploiters.

10 Anti-bribery, financial crime and sanctions: Suppliers must not offer, promise, give, request or accept an advantage intended to induce or reward improper performance, make facilitation payments or conceal conflicts. Suppliers and their personnel and subcontractors must comply with applicable anti-bribery, anti-money-laundering, fraud, tax-evasion-facilitation and sanctions law, maintain proportionate prevention controls and notify the Group promptly of any material investigation, designation, debarment or breach relevant to a Group contract.

11 Health and safety: Suppliers must comply with all health, safety and security legislation of the jurisdiction in which they conduct business, so that employees of the suppliers are provided with a safe place of work and operate under safe business practices.

Obligation to ensure compliance

12 Obligation: Every supplier must ensure and be able to evidence that:

- relevant personnel receive induction and periodic, risk-based training and understand this Code, warning signs, safe reporting routes and their responsibilities; and
- directors, workers, agents and relevant subcontractors comply with this Code, and equivalent obligations are flowed down, monitored and enforced proportionately.

13 Supplier due diligence: Suppliers must assess modern-slavery risk before appointment and throughout relevant supply-chain relationships. Due diligence must be proportionate to sector, product, service, geography, workforce model, recruitment channel, subcontracting, commodity and known indicators. Higher-risk activity may require supply-chain mapping, ownership and labour-provider checks, worker engagement, site assessment, wage and recruitment-fee review, contractual controls and verified corrective action. Reliance on questionnaires or a published policy alone is insufficient.

14 Evidence, records and notification: On request, suppliers must provide timely evidence of risk assessments, supply-chain mapping, policies, training, due diligence, audits, worker-engagement, grievances, incidents, corrective action and effectiveness measures, subject to lawful confidentiality and data-protection controls. Suppliers must notify the Group promptly of a material actual or suspected incident, regulatory or criminal investigation, or failure to meet an agreed corrective-action plan relevant to Group goods or services.

Reporting

15 Concerns, suspicions and victim safety: Suppliers must notify the CFO promptly of actual or suspected modern slavery connected with Group goods or services, without waiting for proof or a completed investigation. If anyone is in immediate danger,

contact emergency services first. Suppliers must not confront or alert a suspected exploiter, destroy evidence or take action that could increase harm. Reports should record available facts and safeguarding action, but absence of documents must not delay urgent escalation. Suppliers must cooperate with lawful referrals and protect reporters and potential victims from retaliation.

Monitoring

16 Monitoring and access: The Group may monitor compliance proportionately through questionnaires, document review, data, meetings, site visits, independent audits and confidential worker interviews. Audit and access rights are subject to contract, law, safeguarding, confidentiality and reasonable safety arrangements; unannounced activity may be used where contractually permitted and justified by risk. Suppliers must not coach workers, retaliate, obstruct access or falsify records and must ensure relevant subcontractors cooperate. The Group may require a time-bound corrective-action plan and verification of completion.

Breaches of this Code of Conduct

17 Breach, remediation and termination: A breach may result in enhanced monitoring, suspension, corrective action, worker remedy, repayment of recruitment fees or withheld wages, referral to authorities, exclusion where legally applicable, or termination under the contract. Decisions will prioritise potential victims and consider whether abrupt disengagement could worsen harm. Serious, deliberate, continuing or unremedied breaches, retaliation, obstruction or failure to cooperate may result in immediate suspension or termination. Nothing in this Code limits any contractual or legal right.

Authorised by: Cavendish Education Group Board Version 1.1

Date: 10 August 2026

Effective date of the policy: Immediately

Review: August 2028

Circulation: All Suppliers

Status: Designed to support compliance with the Modern Slavery Act 2015 and current Home Office supply-chain guidance; legal applicability must be assessed for each Group entity and contract