



ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

1st April 2019 to 31st March 2020 pursuant to the Modern Slavery Act 2015

1 POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

Oxford International recognises that it has a responsibility to take a robust approach to slavery and human trafficking. This statement sets out the steps we have taken and will continue to take to ensure that slavery and human trafficking are not taking place anywhere in our own business or in any of our supply chains.

2 GROUP STRUCTURE

Oxford International Education 1 Ltd (known as Oxford International Education Group) is a provider of higher education, 6th Form, English language and educational tour programmes in the private education sector. Currently OIE 1 Ltd operates in the UK, USA, Canada, China, Hong Kong and has presences in several other countries. Applicable companies within the Group are:

Oxford International Education and Travel Ltd
Studytrips Ltd
d'Overbroeck's Ltd
Oxford International College Ltd
Oxford International Education Group Services Ltd
LIPC Partnership Ltd
Oxford International Education Services Inc.
Beijing Pathways Education Consulting Company Ltd
BIC Partnership Ltd
ICD Partnership Ltd
Greenwich International College Ltd
Oxford Tutorial College Ltd

3 OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Oxford International has a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships to implement and enforce appropriate and

effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains. Central Whistleblowing Policy and Employee Code of Conduct.

4 STAFF

The majority of our staff are office based and employed on contracts that meet or exceed current employment legislation.

We engage a small number of contractor/consultants all of whom are provided with service agreements that have been reviewed by our legal advisors.

Where we use agencies to provide staff, we only use highly reputable providers.

We therefore believe that the risk of modern slavery occurring within our employee base is very low.

5 OUR SUPPLY CHAINS

We have not identified any instance or indications that either slavery or human trafficking occurs in our supply chain. Nor is the education sector considered one most at risk. We do not have complicated supply chains with extensive sub-contracting. Our supply chains consist primarily of student recruitment agents, IT suppliers, transport providers (coach, ferry, rail and airline companies), schools and universities.

However, Oxford International recognises that it has partners operating in countries deemed of higher risk. In order to mitigate such risks, all of our sales representatives, who regularly visit these countries, have received the iHASCO training (see below).

6 COMPLIANCE & DUE DILIGENCE

We expect all those in our supply chains to comply with our values and expect any entity with which we do business to have suitable anti-slavery policies and processes in place.

Notwithstanding the above, Oxford International therefore plans to take the following action:

- Introduce a Supplier Code of Conduct, setting out our expectations that our supplier will provide safe working conditions, treat workers with respect and dignity and act ethically and within prevailing employment laws.
- Require all suppliers to accept standard terms and conditions to comply with applicable anti-slavery and human trafficking legislation.
- Ensure all our contractual arrangements with existing suppliers are amended on renewal to include specific provisions regarding slavery and human trafficking.
- Integrate better assessment of the modern slavery risks presented by our suppliers.
- Introduce supplier due diligence to address the risk of modern slavery.

7 COMMUNICATION AND TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will be providing appropriate training to relevant staff to raise awareness and ensure they and all staff know how to recognise red flags and raise concerns. This will include online training provided by iHASCO, who currently provide the Group with other compliance training.

All staff will be made aware of this policy and how to access it as part of their induction.

Oxford International is absolutely committed to preventing slavery and human trafficking in its corporate activities.

A handwritten signature in black ink, appearing to read 'Lil Breermann-Richard', with a stylized flourish at the end.

Lil Breermann-Richard

Group CEO, Oxford International Education Group

1st April 2019