

Oxford International Education Group Supplier Code of Conduct

1. Introduction

Oxford International Education Group (OIEG) is committed to operate with the utmost integrity in its relationships with all its stakeholders and aspires to be recognised as a responsible corporate citizen who is making a positive impact on the world around us through our products and our actions.

We expect our suppliers to share our commitments and approach. Therefore we require all our suppliers to adhere to the below guidelines and to confirm in signing up to this code that they expect these requirements also of their supply chain, including sub-contractors.

At Oxford International, we believe that by working collaboratively we can together have a positive impact on society.

Date: 15 September 2021

Signed: Chief Executive, Oxford International Education Group

2. Laws and regulations

Suppliers will comply with all applicable local and national laws, rules, regulations and requirements in the provision of products and services manufactured and provided to OIEG. This includes compliance with the International Labour Organisation (ILO) Core Conventions. It is the supplier's responsibility to maintain and enforce these standards within its own supply chain.

3. Underage labour

Suppliers shall ensure that no underage labour has been used in the production or distribution of goods and services to OIEG. A child is any person under the minimum employment age according to ILO Convention no 138 on Minimum Age (C138) or the laws of the country where the product (or parts of) or services are sourced from (whichever is highest).

4. Forced labour

Suppliers will not use or tolerate in their supply chain any form of slavery, servitude, indentured, bonded, involuntary prison, military or compulsory labour or any form of human trafficking.

All work must be conducted voluntarily and without threat of any penalty or sanctions.

No employee government issued identification, passports or work permits will be retained by the supplier as a condition of employment.

Workers' rights to leave the workplace after their shift or to terminate their employment after reasonable notice and receive owed salary must be recognised by the supplier. This applies to local or migrant employees.

Suppliers are asked to report to OIEG any incidents of slavery or human trafficking found in its business or supply chain.

5. Freedom of association

Suppliers shall respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable local and national laws and freedom of association and collective bargaining. Suppliers shall not interfere with or discriminate against workers choosing to belong to them.

Where the right to freedom of association and collective bargaining is restricted under national law, suppliers will facilitate, not hinder, alternative means of independent and free association and bargaining.

6. Inclusivity

At Oxford International we insist that colleagues treat each other with respect and create a working environment that is inclusive.

Discrimination, harassment and threats in any form is not tolerated. We require the same commitment from our suppliers who themselves will undertake to create a positive and inclusive culture for their employees and workers.

7. Wages and benefits

Wages and benefits must meet legal minimums and industry standards without unauthorised deductions.

8. Working hours

Suppliers must ensure working hours comply with national laws and standards and should not expect workers to work (including overtime) in excess of hours set out in relevant working time legislation or other national legal limits unless an opt out has been chosen by the employee with appropriate supporting written evidence.

9. Healthy and safe working conditions

Suppliers must provide safe and clean conditions for workers at sites of working and residential facilities. Clear procedures must be in place to ensure regulated occupational health, safety and wellbeing standards are adhered to.

10. Environment

Suppliers must have clear procedures in place to ensure direct and indirect environmental impacts associated with the goods and services are understood, measured and managed.

11. Business integrity

Suppliers shall not engage in any form of bribery or corruption or undertake any action that contravenes the OIEG Anti-Bribery and Corruption policy.

12. Discipline and grievances

Suppliers must provide a grievance mechanism for workers and their organisations to enable workers to anonymously raise workplace concerns. The mechanism must be transparent, set out clearly how grievances will be assessed and feedback provided. Workers and their representatives must be informed clearly how the scheme operates and its scope and that it is equally accessible to all workers.

Disciplinary procedures shall be clearly documented, communicated and easily accessible to all workers. All disciplinary matters shall be recorded including evidence that the worker knew and understood what he/she was accused of and given the right to appropriate representation at disciplinary meetings which may lead to significant disciplinary penalties or dismissal.

13. Compliance with Code

Suppliers must be able to demonstrate compliance with the Oxford International Code of Conduct. This includes documented evidence and the right of Oxford International or a designated firm to conduct audits. Audits to include facility inspections, review of supplier records business practices and conducting employee interviews.

14. Reporting concerns

In relation to 2. to 13. above suppliers are invited to report any area of concern to Oxford International. An external whistleblowing helpline via Navex Global is available. Any concerns can be reported via the telephone number 0800890011 followed by 833-604-0808 or via the website at: oxfordinternational.ethicspoint.com