

T R I B A L

Tribal Group plc

Slavery and Human Trafficking Statement

16 April 2019



An Introduction

Commencing 29th October 2015, medium to large sized companies are required to make a statement on their slavery and human trafficking policy for each financial year in accordance with by Section 54 of the Modern Slavery Act 2015 (“the Act”).

This is Tribal Group plc's (Tribal) slavery and human trafficking statement for the last financial year ended 31 December 2018 and current as at 15 April 2019.

Purpose

The purpose of the Act is to eradicate modern slavery. This encompasses human trafficking, slavery, forced labour and servitude. As a commercial organisation we are required to publish an annual statement setting out the steps that we are taking to prevent modern slavery in our business and in our supply chain. The Act has the effect of exposing companies to the common practices of contract governance through the transparency the Act imposes on a company’s supply chains, policies and procedures. The Act also seeks to highlight the need to be alert to the risks the business faces, including its wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

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 clients use our expertise, software and services to assist with student enrolment, assessment and reporting obligations. These core functions underpin student success. We operate in the UK, Europe, Australia, New Zealand, Canada, United States, Middle East and South East Asia.

Tribal's group structure is detailed in the Corporate Entities Table below which includes its overseas subsidiaries and branches. The Group's turnover is in excess of £80 million per annum (2018 Annual Report and Accounts for year ended 31 December 2018).

Our Supply Chains and Their Adherence to Our Values

As a global business, - Tribal has clients, suppliers, sub-contractors, associates and employees who are based within and outside the UK. Tribal recognises the need to ensure compliance with the provisions of the Act beyond the UK and has therefore introduced changes across the entire business in order to comply with its statutory obligation and accreditations such as ISO27001. A number of Tribal's clients are public sector bodies and other organisations that also need to comply with requirements of the Act.

In the main, Tribal's supply chain is based in low risk countries where modern forms of slavery are not prevalent. Tribal's supply chains comprise mainly human resources who perform skilled services, whether they be employees, sub-contractors, associates or agents. Traditionally, Tribal has excellent relationships with trade unions and representative bodies that represent the interests of our workforce. Tribal also sources software from third parties to facilitate the production of its own services or incorporated into its products.

Tribal's business model is substantially the development, licence, implementation, hosting and support of its own software products. It also conducts quality assurance audits of educational institutions,

undertakes survey and research of educational institutions and produces benchmark reports based on its industry knowledge and expertise.

Tribal is often required to negotiate and enter into contractual arrangements dictated by its customer's standards and contracts, usually as part of a tender process,

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). 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 antislavery Policy. These steps help ensure that the contracts we enter into through our subsidiaries contain provisions that conform with the Act. In the alternative these steps ensure compliance with suitable equivalent statutory provisions in relation to contracts that are subject to the laws of a foreign jurisdiction.

Our Policies and Due Diligence Process for Slavery and Human Trafficking

Tribal is committed to ensuring that there is no human trafficking and slavery taking place in our company and supply chains. Tribal's policy supports its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls in order to ensure that slavery and human trafficking is not taking place anywhere in its global supply chains.

Tribal has several policies/procedures/practices to manage the inherent risks, including:

- Only using licensed premises to optimise the control over the environment;
- Considering the geographical location of suppliers and the risks particular to that location;
- Establishing long standing relationships with customers and suppliers;
- Requiring each entity in the chain to apply its own due diligence on the next link in the chain as it is not always possible/practicable for Tribal to have a direct relationship with all links in the chain;
- Effective systems to encourage the reporting of concerns and the protection of whistle-blowers Tribal's Whistleblowing Policy was reviewed and re-written in recent years to ensure it was appropriate to manage a report under the Act;
- A Global Governance Team which oversees and manages the governance obligations of Tribal, including compliance with the Act.

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.

Procurement of Services and Products

Tribal Property, IT & Procurements teams procure services & products relating to Facilities (cleaning, maintenance, security, printers, IT contractors and services). These teams select, appoint and manage suppliers in the UK and overseas. Part of this process is via tender during which 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”) accreditations, insurances, equality and diversity & 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?*

Contractors engaged by Tribal are requested to confirm that they pay the living wage (as set by www.livingwage.org) to their staff.

Staff Training

Tribal operates an annual programme of corporate compliance training which is mandatory for all staff. This includes training on the terms of the Act, how we comply with our responsibilities under it and being aware of issues that the Act is intended to address such as human trafficking, the ability of an individual to choose employment, safe working environment, prohibition on use of child labour, non-discrimination, working time directive and that no harsh or inhuman treatment is allowed in the workplace.

Our Effectiveness in Combating Slavery and Human Trafficking

Tribal’s Global Governance Team report to the Board of Directors on a monthly basis. An aspect of their reporting covers compliance with the Act. The Global Governance Team uses key performance indicators to measure Tribal's effectiveness in tackling 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.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Tribal Group’s slavery and human trafficking statement for the current financial year. It has been reviewed and approved by the Board of Directors.



Mark Pickett
Chief Executive Officer

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
Tribal Group Pty Limited (Australian company)	Australia	Branch
Class Measures Limited	UK	Company
Class Measures Inc. (USA company)	USA	Company
Tribal Education Limited (Abu Dhabi branch)	Abu Dhabi	Branch
Tribal Education Inc. (USA company)	USA	Company
Tribal Middle East SPC (Bahrain company)	Bahrain	Company
Tribal Systems Canada Limited	Canada	Company
Tribal Group South Africa (Pty) Ltd	South Africa	Company
Tribal Holdings Limited	UK	Company
International Graduate Insight Group Limited	UK	Company
i-Graduate USA LLC (USA company)	USA	Company
Human Edge Software Philippines Inc	Philippines	Company
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 Education Limited (Hungary) branch	Hungary	Branch
Tribal Education Limited (South Africa) branch	South Africa	Branch
Tribal Group Asset Company Limited	Australia	Company