

TRIBAL GROUP PLC
SLAVERY AND HUMAN TRAFFICKING STATEMENT

An Introduction

As of 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 as imposed by s.54 of the Modern Slavery Act 2015.

The purpose of the Modern Slavery Act (“the Act”) is to eradicate modern slavery, which encompasses human trafficking, slavery, forced labour and servitude. By introducing this Act, companies are exposed to share their common practices of contract governance through the transparency this Act imposes on their supply chains, policies and procedures. There is a 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. The table below represents the company structure which includes its overseas subsidiaries and branches. The Group’s turnover is in excess of £100 million per annum.

Our Supply Chains and their adherence to our values

As a global business, Tribal has a number of clients, sub-contractors, associates and employees who are based outside the UK. Tribal recognises the need to ensure its compliance with the provisions of the Act beyond the UK and has therefore introduced changes across the entire business.

The majority of the UK based clients consist of governmental and educational organisations that also need to comply with requirements of the Act. We are often required to negotiate on terms based on standards used by the relevant body and any non-Tribal contracts are required to be reviewed by the in house legal team.

Our Policies and Due Diligence Process for Slavery and Human Trafficking

We are committed to ensuring that there is no human trafficking and slavery taking place in our company and supply chains. We have created an Antislavery Policy which supports our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Some of the steps we have put in place to mitigate the risks inherent in this area include the following:

- We use licenced premises to optimise the control of our environment;
- We consider geographical location of our suppliers and the risks particular to that location;
- We seek to establish long standing relationships with existing and new customers;
- We expect each entity in the chain to apply their due diligence on the next link in the chain as it is not practical for us to have a direct relationship with all links in the chain; and
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Risk and Mitigation

In order to make the provisions of the Modern Slavery Act applicable in all of the territories in which we operate, we need to ensure certain processes are being followed in order to identify and mitigate related risk. Initial steps we have taken include raising awareness of slavery and human trafficking and identifying any processes we can implement to identify any unusual business behaviour.

Our policies are supported by the board of directors and senior management in order to influence positive and appropriate behaviour within our organisation. This approach also influences suppliers and subcontractors particularly when risk assessment of their operations is undertaken comprehensively.

Our effectiveness in combating Slavery and Human Trafficking

The following are a few key performance indicators we use in measuring effectiveness of tackling slavery and human trafficking within the business and its supply chain:

- Measuring minimum labour standards expected of us, our subsidiaries and suppliers, in the various territories in which we operate 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 amongst our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the current financial year.

Mark Pickett
Company Secretary
Tribal Group plc