

ARDEN UNIVERSITY LIMITED STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

Introduction from the Carl Lygo, CEO and Vice-Chancellor

We, at Arden University, are proud of the diversity of our student population providing opportunities to students from around the world access to gain undergraduate and postgraduate degrees but we also recognise that with our international presence we have a responsibility to demand and promote ethical business practices from our suppliers, partners and customers. As we grow and become a stronger brand, we have to use that strength to drive changes within our supply chain and to support all of our partners in their drive to behave ethically and responsibly.

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. We continue to review our supply chain, processes and controls, implement and enforce effective systems to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This statement applies to all Arden University employees.

About Arden University

Arden University is a limited company incorporated in the United Kingdom under company registration 02450180. We are a leading provider of flexible, online and blended learning. We are a part of the Global University Systems Group of Companies (Group), and our ultimate parent company is Global University Systems B.V. which has its registered office is at Strawinskylaan 821, Tower A-08, 1077XX, Amsterdam, The Netherlands. We have over 400 employees and over 16000 students and learners worldwide and deliver undergraduate and postgraduate programmes.

Arden University is governed by a board and an executive team. The board is made up of 6 directors which includes myself, 3 non executive directors and 2 directors appointed by our shareholder. Its role is to oversee Arden University's operations, with special responsibility for ensuring academic quality and regulatory requirements. The executive team are responsible for the strategic development and day-to-day management of Arden University.

We are committed to help our students shape the future of business. We let them choose the course and learning method which matches their self-development needs. The digital learning technology we have allows our students to decide where, when and how they study.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery and human trafficking Policy reflects 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.

A copy of the Anti-Slavery and Human Trafficking Policy can be found here www.arden.ac.uk/modern-slavery. We recognise the need to review our policies and processes regularly and to make changes, whenever necessary, to ensure that modern slavery or human trafficking has no place in our supply chain.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have the following measures in place:

- contract database detailing our suppliers and customers;
- data analytics tools to monitor and track agents we work with;
- approval and sign-off protocols for contracts;
- credit and corporate structure checking in place for new and existing suppliers; and
- whistleblowing policies and procedures.

In order to enhance our ability to identify, manage and mitigate risk within our supply chain we are introducing the following measures:

- Annual internal review of the supply chain;
- Detailed modern slavery due diligence questionnaire for all new suppliers;
- Whistleblowing hotline available to all members of staff;
- Enhanced contract approval and management processes;
- Dedicated and accessible training for all staff;
- Pay all staff aged 18 or over, a minimum of the Real Living Wage (London or UK as appropriate, depending on location) and pay any contract or sub-contract staff aged 18 or over, a minimum of the Real Living Wage (London or UK as appropriate, depending on location), and to comply with the guidelines governing the payment of the Real Living Wage, as determined by the Living Wage Foundation;
- Comply with any applicable minimum wage requirements of another country, for those staff members, contract or sub-contract staff, where such individuals are based in that other country;
- Ensure that all staff are subject to UK Right to Work checks or other checks necessary to ensure compliance with UK or, where applicable, other countries' immigration requirements.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking and expect our suppliers to adopt the same approach. The measures set out above allow us to work with, monitor and manage our relationships to ensure compliance. Under the leadership of the Legal, Commercial and People teams, we are implementing measures to educate our colleagues and work more closely with our suppliers, customers and partners to monitor compliance with our ethics and approach to slavery and human trafficking.

Our supply chains include the purchase of goods and services necessary for our operation. Our supply chains are diverse and include individuals as well as large commercial entities. We require those entities to comply with ethical procurement standards and the provisions of the Modern Slavery Act 2015.

Where possible, when we utilise contractors and casual workers in our business to undertake specific pieces of work, we contract direct with the contractor. We require these individuals to confirm they

have read and understood our Anti-Slavery and Human Trafficking Policy and then complete the same e-learning as University staff.

In general, we require suppliers to contract on the University's standard terms in relation to Modern Slavery.

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 have introduced training for all our staff and expect our suppliers, customers and partners to train their staff. Staff receive e-learning training which assists staff in identifying modern slavery and taking appropriate action to bring any issues to the attention of Arden University or the Modern Slavery Helpline.

Our effectiveness in combating slavery and human trafficking

In recent years we have made improvements in our systems and processes to better manage against modern slavery and human trafficking within our supply chain but we will not become complacent. We recognise the need to continue to work with suppliers and partners to ensure that ethical business practices are employed throughout our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 October 2021.

Carl Lygo, CEO and Vice-Chancellor
ARDEN UNIVERSITY LIMITED