

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

This Modern Slavery statement is prepared for the purposes of section 54 of the Modern Slavery Act 2015. It outlines the approach taken by Study International UK Limited to ensure that our business and supply chains are free of slavery and human trafficking, that all employees are treated with respect and dignity, are working under their own free will, and are being properly compensated for their effort. We are committed to continuously improving our practices and procedures to ensure that we are not complicit in any human rights violations.

### **Organisation Structure**

Study International UK Limited is a subsidiary of Sorrento Bidco Limited. We operate in the International Education sector supporting the recruitment of international students to universities in the UK, Canada, US, Australia and New Zealand.

We have approximately 1,000 employees globally and have business operations in Jersey, as well as

- ❖ The UK
- ❖ India
- ❖ Thailand
- ❖ Japan
- ❖ Canada

### **Our Supply Chains**

We work with a number of key direct partners and suppliers who identify students interested in studying in UK, Canada, USA, Australia and New Zealand. Study International assists these students access courses at collaborating universities, colleges, higher education institutions.

For more information about the company, please visit our website:

[www.gostudyin.com](http://www.gostudyin.com)

### **Our Policies on slavery and human trafficking**

We have policies in place that underpin our commitment to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in the company or supply chain. The company undertakes to remain compliant with the Modern Slavery Act 2015.

Our Recruitment Policies and Code of Business Conduct provide that there is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, slavery, mental or physical coercion or verbal abuse of workers,

nor is there to be the threat of any such treatment.

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We are committed to a workforce that is free of harassment and unlawful discrimination, including race, colour, religion, national origin, gender (including pregnancy), age, disability, sexual orientation, gender identity, HIV status, marital status, past or recent military status or any other status protected by the laws or regulations in the locations where we operate.

### **Risk Management and Due Diligence**

We consider we operate in an environment that has a degree of risk, as we are an international business recruiting students through supply partners world-wide.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have risk management procedures in place to:

- ❖ Identify and action potential risks in our business and supply chains.
- ❖ Monitor those potential risks in our business and supply chains
- ❖ Audit a proportion of suppliers and transactions

We have adopted the following due diligence procedures to support our risk management:

- ❖ Internal supplier audits targeted at identified higher risk jurisdictions ❖  
Checks on certain suppliers with external third parties (World Check-One) for any slavery or human trafficking risks
- ❖ Protecting whistleblowers who report unethical conduct; and
- ❖ Where possible, we build long standing relationships with our supply chains globally and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

### **Supplier Adherence to our Values**

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our procedures by any of our suppliers, we will require that supplier to remedy the non-compliance failing which we reserve the right to terminate our contract with them.

### **Next steps**

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

- ❖ Emphasising our zero tolerance approach to all new suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter by our account managers and Business Development team
- ❖ Evaluating the slavery and human trafficking risks of each new supplier
- ❖ Creating an annual risk profile of key suppliers

- ❖ Review on a regular basis all aspects of the supply chain based on supply chain mapping

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- ❖ Communicate to all existing suppliers, contractors and business partners to remind them of our zero tolerance approach and audit programme

### **Training of our staff**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain we require staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- ❖ How to identify the signs of slavery and human trafficking
- ❖ What initial steps should be taken if slavery or human trafficking is suspected
- ❖ How to escalate potential slavery or human trafficking issues to the relevant parties within the Company
- ❖ What external help is available
- ❖ What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high risk scenarios, including their removal from the Companies supply chain

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to the actions and activities for the financial year ending March 2023.

The statement was approved by the board of directors on 26<sup>th</sup> August 2025.