

## Modern Slavery Act – Supplier Code of Conduct

### Introduction

1 The Group's commitment: As part of our commitment to both pupils, students, parents and staff, we are proud of our core values which sit at the heart of Cavendish Group and all of its family and are incorporated in every aspect of our businesses.

We are passionate about excellence and committed to complying with the highest standards of ethical and professional behaviour.

2 Commitment from others: We expect the same high standards of our suppliers of goods and services. Our relationship with suppliers is critical to our success and we expect our suppliers to comply with the requirements set out in this Code of Conduct.

3 Application: This Code of Conduct applies to contractors, agency workers, agents, external consultants, seconded workers, third-party representatives and other business partners working for or on behalf of any member of the Cavendish Education Group (collectively known as 'suppliers').

### Legal compliance

4 Requirement of suppliers: Suppliers of goods and services to any member of the Cavendish Education Group are required to comply with all applicable legal and regulatory requirements and must commit to acting transparently, ethically and with integrity in all their business dealings. This includes implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in its own business or its own supply chains, and holding its own suppliers to the same high standards.

### Employment practices

5 Equal opportunities, dignity and respect of staff: Every member of the Cavendish Education Group is committed to ensuring its staff (which includes directors, employees, governors, students and volunteers) are treated with dignity and respect and is committed to the principles of equality and diversity, opposing

discrimination on any grounds. The Cavendish Education Group is committed to equal opportunities and will take every possible step to ensure that its staff are treated equally and fairly. All policies and practices will conform with the principle of equal opportunities in terms of recruitment, selection, training, promotion, career development, discipline, redundancy and dismissal.

6 Equal opportunities, dignity and respect by suppliers: The Cavendish Education Group expects the same of its suppliers as set out in paragraph 5. It expects suppliers of goods and services to comply with all employment legislation including equality, health and safety and immigration legislation in the jurisdictions in which it operates, free from forced or compulsory labour and without the threat of penalty or exploitation. In addition, suppliers should not engage in practices that may increase the risk of modern slavery.

#### Whistleblowing and grievances

7 Supplier policies and procedures: The Cavendish Education Group expects all its suppliers to support whistleblowing within their organisations and to have appropriate policies and procedures in place to enable protected disclosures to be made and concerns or grievances to be raised and handled effectively.

#### Supplier business practices

8 Reputation of the Cavendish Education Group: The Cavendish Education Group expects its suppliers, their subcontractors and business partners to conduct themselves in a manner which does not adversely affect the reputation of the Cavendish Education Group or bring it into disrepute.

9 Data protection: Suppliers should adhere to data protection legislation applicable to English jurisdiction to preserve the integrity and security of information the Cavendish Education Group may share with it.

10 Anti-Bribery and Corruption: Suppliers must never offer, promise, authorise or give, directly or indirectly, anything of value with the intent or effect of inducing anyone to act in breach of their duties and provide an unfair business advantage to the Cavendish Education Group, themselves, or others. Suppliers and their employees, representatives and sub-contractors are required to comply with all laws relating to anti-corruption and anti-money laundering in the countries in which they or any affiliated business or associate of a supplier provides products or services, directly or indirectly, conducts business.

11 Health and safety: Suppliers must comply with all health, safety and security legislation of the jurisdiction in which they conducts business, so that employees of the suppliers are provided with a safe place of work and operate under safe business practices.

#### Obligation to ensure compliance

12 Obligation: Every supplier is obliged to ensure:

12.1 all relevant personnel are aware of and understand the requirements of this Code of Conduct; and

12.2 all directors, employees and sub-contractors comply with this Code of Conduct.

13 Supplier due diligence: the Cavendish Education Group expects all suppliers to carry out due diligence on their own supply chains to ensure they too adhere to and comply with the requirements of this Code of Conduct or their own similar code.

14 Evidence of due diligence: On request, the Cavendish Education Group requires all suppliers to provide details of any due diligence carried out on their own supply chain.

#### Reporting

15 Concerns or suspicions: Should suppliers have any concerns or suspicions of modern slavery in their business or supply chain these should be brought to the attention of the Compliance Director, as soon as is reasonably practicable. Suppliers should set out in writing their reasons for these concerns and clearly list any documentation which evidences their concerns and/or suspicions.

#### Monitoring

16 Monitoring: It is important to the Cavendish Education Group that it monitors supply chains to ensure compliance with this Code of Conduct. The Cavendish Education Group may therefore from time to time carry out an audit of its suppliers which may include asking questions of suppliers, conducting unscheduled visits or speaking with employees or workers directly.

#### Breaches of this Code of Conduct

17 Breach: The Cavendish Education Group expects all suppliers to comply with the requirements of this Code of Conduct. Our engagement with you is predicated on this understanding. Any supplier who provides services to the Cavendish Education Group or on the Cavendish Education Group's behalf and is found to be in breach of this Code of Conduct can expect to have its contract terminated.

Authorised by: Cavendish Education Group Board

Date: 31 January 2022

Effective date of the policy: 31 January 2024

Circulation: All Suppliers

Status: Complies with Modern Slavery Act 2015