

Arden University Modern Slavery Statement

CEO & Vice Chancellor Introduction

We have a proud heritage in providing flexible and accessible higher education to complement the changing requirements of modern life. We provide undergraduate and postgraduate degree opportunities to a diverse student population from around the world, supported by a diverse and international supply network.

We strive to do things differently and believe in doing things better and this mission is extended to our ethical and social responsibilities.

We recognise that modern slavery should not be in existence today as it represents a violation of fundamental human rights, depriving and exploiting men, women and children in the UK and globally for unethical gain.

Across our UK and international businesses, we have a zero-tolerance approach to unethical behaviour, particularly modern slavery, and we are committed to acting with integrity in all business operations and relationships.

Therefore, it is our responsibility to demand and promote ethical business practices and extend this to our suppliers, partners, and customers. As we grow and become a stronger brand, we need to use that strength to drive changes with our supply network partners to help eliminate modern slavery activities for good.

Our Structure

We are part of the Global University Systems group of companies, with our ultimate parent company being Global University Systems, which is registered in The Netherlands under company number 55367453.

We have over 1,233 employees supporting 36,781 students enrolled on our online or blended learning courses worldwide.

Arden University is governed by a Board and an Executive Team. The Board is made up of our 6-directors (CEO, 3 Non-Executive Directors and 2 Directors appointed by our shareholder). Its role is to oversee our business operations, with particular focus on ensuring academic quality and regulatory requirements. The Executive Team are responsible for the strategic development and day-to-day management of the business.

Related Policies

We remain committed to ensuring that there is no modern slavery or human trafficking in our business or our supply network. We commit to regular reviews of our policies and processes and make necessary changes when required.

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 supply network.

Related Due Diligence

As part of our initiative to identify and mitigate risk we have a Modern Slavery Strategy, which highlights improvements to our modern slavery compliance over the longer-term.

In the last 12 months, we have rolled out our supplier Code of Conduct to our key suppliers. All of whom agreed to comply or have policies that match our own expectations.

We also launched our modern slavery questionnaire to monitor progress of our at-risk suppliers, as indicated by the ILO.

Our tendering and contracting process has also been updated to ensure modern slavery provisions are included before agreeing to onboard suppliers as part of our due diligence requirements.

To enhance our ability to identify, manage and mitigate risk within our supply chain we are continuing the following measures over the next 12 months:

- Annual internal review of our key suppliers and agent networks
- Annual internal review of our suppliers in modern slavery at-risk industries as indicated by the ILO guidance
- Annual due diligence questionnaire for all at-risk suppliers, with procurement facilitating supplier meetings to work with suppliers who have responded inadequately
- Enhancing our contract approval and management processes
- Progressing and promoting our supplier Code of Conduct

Related Training

To ensure a high-level understanding of modern slavery and human trafficking in our business and supply network, all staff are expected to complete mandatory modern slavery training during their induction, and annually thereafter, to be aware of the risks, signs, legislation and responsibilities we each have to spot, prevent and report modern slavery activities.

Under our Supplier Code of Conduct, it is our expectation that our suppliers and partners will train their staff to the same standard that we have introduced for our employees.

Our Values & Supplier Adherence

We have zero tolerance to modern 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 modern slavery and human trafficking.

Our supply network includes the purchase of goods and services necessary for our operations. Our supply network is 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.

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

Risk Assessment

We have started a risk-based approach to analysing suppliers and supply networks that may be at a high-risk for modern slavery.

All suppliers will be expected to comply with our Supplier Code of Conduct, which was published in 2023. However, those classified as being high-risk will be monitored in regular review meetings to ensure compliance.

Should we or our suppliers, suspect or uncover modern slavery activities, it should be reported to the [Modern Slavery Helpline](#) or the Arden University Whistleblowing line.

Existing Effectiveness

In recent years we have made improvements in our systems and processes to better manage against modern slavery and human trafficking within our business and supply networks, 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 networks.

This statement applies to all employees and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 May 2024.

Carl Lygo
CEO and Vice Chancellor
Arden University Limited