



PARENTPAY GROUP MODERN DAY SLAVERY STATEMENT

Our policy on anti-slavery and human trafficking explains our commitment to ensuring our supply chain is free from modern slavery and the actions we've taken to understand potential risks in relation to our business.

This statement is published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by ParentPay Group of companies to prevent modern slavery and human trafficking in its business entities and supply chains.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are fully committed to preventing slavery and human trafficking in our business activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Definitions

"Modern slavery" refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour.

"Human trafficking" involves the recruitment, transfer or obtaining of an individual through coercion, abduction, fraud, or force to exploit them. There are several broad categories of exploitation linked to human trafficking, including sexual exploitation, forced labour, domestic servitude, organ harvesting, child related crimes, forced marriage and illegal adoption.

Modern slavery is an international crime affecting millions of individuals globally, an issue that transcends age, gender, and ethnicities. Modern slavery includes victims who have been brought from overseas and vulnerable people in the UK who are forced to work illegally against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

Our policy

ParentPay Group's policy is to conduct all of our business in an honest and ethical manner, and to comply with all applicable legislation. We strive to ensure that there is neither modern slavery nor human trafficking in our supply chain or in any part of our business.

Our internal and external policies and procedures reflect our commitment to these objectives and to enforcing appropriate systems and controls which aim for a zero-tolerance approach to anti-slavery and human trafficking laws.

Our Business Structure

ParentPay Group consists of four UK operating companies: ParentPay Ltd; Nimbl Ltd; Just Education Ltd; and, Just Education Recruitment Ltd, each of which sits under our group parent company ParentPay (Holdings) Ltd. In addition, we have operating companies in the Netherlands and in Germany, with the group employing a total of approximately 300 staff across Europe.

Our Supply Chain

We have a supply chain of around 100 suppliers, the majority of which are based in the UK (for example for payment processing, hosting, and consultancy) or in the US (in the case of software tools used by the group). We also have offshore software development partners in Sri Lanka and Moldova.

Our suppliers and contractors include professional service providers, technical support, property maintenance and facilities management.

We consider that as the majority of our suppliers are not in industries with a high risk of modern day slavery and our supply chains are primarily confined to the UK, we have a low risk of modern day slavery and human trafficking occurring within our supply chain.

The majority of our suppliers are established organisations with robust policies and processes. Our customers also operate in industries with a high degree of independent regulatory scrutiny.

Due Diligence and Risk Assessment Process

We have adopted a risk-based approach to identifying and reviewing suppliers and vendors that fall within industries and/or countries that can carry higher risk. We have measures that assist in the review and management of these areas of risk, including a supplier on-boarding and selection process, as well as ongoing monitoring.

The processes and systems are intended to:

- identify and assess potential risk areas in our supply chains
- mitigate the risk of slavery and human trafficking occurring in our supply chains
- monitor potential risk areas in our supply chains
- protect whistle blowers

Supplier Adherence

To ensure our supply chain complies with our standards, we:

- communicate our expectations to our supply chain in respect of sustainability, anticorruption and bribery and ethical procurement
- encourage our suppliers to cascade similar expectations within their own business and supply chain
- ensure adherence to our policies at supplier selection
- ensure that adherence to our policies is a contractual obligation in our agreements
- Suppliers with a turnover of more than £36 million are requested to provide us with a copy of their Modern Slavery and Human Trafficking Statement
- Higher risk suppliers are issued with our Anti-Slavery Policy and requested to provide a written confirmation that they comply. Higher risk suppliers are those providing personnel or with overseas operations in potentially 'high risk' regions
- The procurement of goods and services is conducted in alignment with our Ethical Procurement Policy
- We have a dedicated Procurement team, ensuring consistency and to ensure we adhere to our procurement governance and process.



- Suppliers are requested to answer an onboarding questionnaire, using our Supplier Auditing tool. All new suppliers are obligated to answer the questions to qualify, if not satisfactory the onboarding will be escalated to a risk-based decision-making process
- All suppliers are required to update information and repeat this process on an annual basis

Employee Awareness and Training

As part of our initiative to identify and mitigate risk we operate a range of policies and procedures appropriate to our businesses which all staff are trained on in their induction. These include policies and procedures in relation to anti-slavery and human trafficking.

ParentPay Group also operates a Whistleblowing Policy. This policy facilitates an independent reporting service available to all employees, customers, officers, consultants, contractors, casual workers, and agency workers who may experience or witness unethical behaviour or practices.

Reporting Knowledge or Suspicion

All employees have an obligation to report knowledge or suspicion of slavery or human trafficking. The ParentPay Group Whistleblowing Policy provides for alternative avenues for reporting, including in respect of suspicion or knowledge of slavery or human trafficking.

Employees who raise concerns of slavery or human trafficking in good faith may do so without fear of discrimination or reprisal. Where statutory reporting requirements and procedures exist, these are fully complied with.

Employees requiring guidance are encouraged to visit the UK Modern Slavery Helpline at <https://www.modernslaveryhelpline.org/>.

- Staff are trained in escalating knowledge through line management and HR
- Staff have been trained that if they suspect or identify modern slavery or human trafficking, they are to report it to the Modern Slavery Helpline on 08000 121 700 or the police on 101, or online via www.modernslaveryhelpline.org.
- All staff are trained to use the independent anonymous Whistleblowing system hosted by Safecall and can call 0800 915 1571 or submit a report online at www.safecall.co.uk/report

Recruitment Procedures

We have procedures in place as part of our recruitment processes in line with UK employment law (as applicable), including “right to work” document checks, contracts of employment, and checks to ensure all employees are above minimum working age (16).

Related policies and documents

In addition to the Whistleblowing and the Anti-Slavery and Human Trafficking Policies, ParentPay Group has a number of related policies and documents which reflect our objective to act honestly and ethically and in line with legal and regulatory obligations. These include:

- ParentPay Group Ethical Purchasing Policy
- ParentPay Group Anti-Corruption and Bribery Policy
- ParentPay Group ESG Policy
- ParentPay Group Social Value Policy

Effectiveness

At no time since its formation has ParentPay Group encountered or been the subject of any allegations or complaints of any occurrence of modern slavery or human trafficking within its business or supply chain.

We use the KPIs outlined in this policy to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains

Looking forward

ParentPay Group will continue to implement the measures outlined in this policy and mitigate the risks of modern slavery and human trafficking on an ongoing basis.

Governance:

This policy and its operations in practice, are reviewed on an annual basis.

Last review: 19 November 2024

Approved on behalf of ParentPay Group:



Michael Weatherston
Group General Counsel