

## SG Global TopCo Limited (trading as Study Group)

### Modern Slavery and Human Trafficking Statement

SG Global TopCo Limited is a holding company within the wider Study Group group of companies. Its subsidiaries include EDU UK Intermediate Limited, Study Group UK Limited and Study Group Limited. For the purposes of this statement, SG Global TopCo Limited and its subsidiaries are referred to collectively as 'Study Group'.

Study Group is a leading provider of international education, working with leading universities across the UK, Europe, North America and Australasia. We nurture ambitious students from diverse academic backgrounds and prepare them for success at their chosen university through our on-campus International Study Centres. Our pathway programmes provide the language, academic and social skills that students need on their journey to university progression and continued success after they graduate. In addition to our pathway programmes, Study Group also operates an international boarding school in the UK under the name 'Bellerbys College' at locations in Brighton and London.

The education sector is not considered one most at risk in terms of modern slavery and Study Group's business contains no intricate supply chains or multiple levels of contracting and sub-contracting. Notwithstanding, Study Group maintains a position of zero-tolerance in relation to matters of slavery and human trafficking within any part of its business operations and takes a risk-based approach regarding its supply chains. Our supply chains consist primarily of student recruitment agents, IT suppliers and estates/facilities management services. We expect all those in our supply chains to comply with our values and all contracts with business partners require prior approval in accordance with our delegation of authority process. Selective and proportionate due diligence is also carried out on new business partners and, where appropriate, our standard contracts have been amended to include an obligation on parties to comply with the provisions of the Modern Slavery Act 2015. We expect any entity with which we do business to have suitable anti-slavery policies and processes in place.

All Study Group employees have the necessary documentation to prove they are legally entitled to work in the country of their employment and no one under the legal minimum age for admission to work is employed. We also have a Whistleblowing Policy that encourages the reporting of wrongdoing, including violations of human rights such as modern slavery or human trafficking. All reports will be investigated thoroughly and appropriate remedial actions taken.

Training about slavery and human trafficking is also available for all employees and contractors of Study Group and employees of other Study Group entities who are based in the UK.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Study Group's slavery and human trafficking statement for the financial year ended 31 December 2020. It was approved by the board of SG Global TopCo Limited on 16 December 2021 and will be reviewed at least once annually.

Signed on behalf of SG Global TopCo Limited



Name: Nick Williams  
Title: Chief Financial Officer  
Date: 16 December 2021



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SG Global TopCo Limited, Registered in England, number 11827427  
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