

Modern Slavery Policy

1. Scope and Purpose

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Athena Global Education has a zero-tolerance approach to modern slavery and human trafficking and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other partners, and as part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 In support of this Policy, Athena Global Education will continue to produce an annual Modern Slavery and Human Trafficking Statement setting out the steps we have taken, and are planning to take, to ensure there is no slavery in our business and supply chains. This statement will be approved by the Board of Governors and signed by the Chair or in their absence another member of the Board.

2. Responsibility for this Policy

2.1 The Executive Team of Athena Global Education has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under the Organization's control comply with it.

2.2 The Academic Director has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 The Manager in charge of Procurement has day-to-day responsibility for implementing this policy in respect of the Organization's supply chains, monitoring its use and effectiveness, dealing with any

queries about it, and reviewing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.4 The Manager/Director in charge of Human Resources has responsibility for ensuring that the Organization's employment policies are compliant with the Modern Slavery Act 2015. 2.5 Deans and Head of the Departments are responsible for ensuring those reporting to them understand and comply with this policy

3. Compliance – Reporting Concerns

3.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for Athena Global Education or under our control. All staffs are required to avoid any activity that might lead to, or suggest, a breach of this policy. If found or suspected of any breach or any activity which has the potential or possibility to have any breach in future to this policy, shall notify the line manager, who should in turn notify the Academic Director at the earliest.

3.2 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Organization or in any of our supply chain.

3.3 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with the manager or with the Department Head. Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chain.

3.5 The Athena Global Education encourage and permits staff, students and anyone contractually associated with the Organization to raise concerns of serious malpractice in the Organization. Deans and Directors or their representative must report any suspected breaches of the Modern Slavery Act to the Chief Executive Officer

3.6 Any allegations of misconduct under this Policy within the jurisdiction of the Organization will be taken seriously. Should any member of the Organization be found to have acted in contravention of this Policy, a strict action will be taken under the Organization's Disciplinary Procedures. Breaches or attempted breaches of the policy may be considered an act of gross misconduct and, where it is considered that a criminal offence has occurred, the police may be informed.

4. Communication and awareness

4.1 Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

4.2 We provide access to specialist training to those staff members who are involved in procurement and managing recruitment.

4.3 This Policy and Statement will be communicated to all staff.

5. Breaches of this policy

5.1 Any employee who breaches this policy may be subject to disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We reserve the right to terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.