Modern Slavery Statement 2018

This Modern Slavery statement outlines Kaplan's standards to ensure that all employees are treated with respect and dignity, are working under their own free will, and are being properly compensated for their effort. Kaplan is committed to the social and environmental responsibility and has zero tolerance for slavery and human trafficking. We are committed to improving our practices to combat slavery and human trafficking and ensuring that we are not complicit in any human rights violations. Kaplan supports and respects the principles proclaimed in the Universal Declaration of Human Rights and believes businesses should ensure that they are not complicit in human rights abuses.

Organisation's structure

We are a provider of educational and training services. We are a part of the Kaplan group of companies and our ultimate parent company is Graham Holdings Company which has its head office in the USA. Kaplan's UK operations have an annual turnover in excess of the statutory threshold.

Our UK business

Our UK business is organised into the following four main business units:

1. Kaplan UK Professional offers courses in a number of locations throughout the UK and provides professional on-site and bespoke training for many of the UK's largest businesses. Programs include accountancy, vocational qualifications, and graduate degrees.
2. Kaplan International Pathways works in partnership with leading UK universities to provide international students with tailored university preparation courses designed for students who wish to study for a bachelor's or master's degree in the UK from all over the world.
3. Kaplan International English offers a wide range of English language courses for students who wish to study English abroad in an English language School.
4. Kaplan Test Prep and Manhattan Prep, both of which provide test preparation and admissions support for a range of university admissions tests, professional licensure exams and similar assessments.

Our supply chains

Our supply chain includes student recruitment agents, IT suppliers, sub-contractors and consultants for education services and homestay and residence companies.

We internally review our supply chain to evaluate risks and review aspects of the supply chain including but not limited to safety, human trafficking, child labour and other legal requirements in order to ensure compliance with our Supply Chain Policy.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, slavery, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment as outlined in our Recruitment Policies and Code of Business Conduct.

We are committed to a workforce that is free of harassment and unlawful discrimination, including race, colour, religion, national origin, gender (including pregnancy), age, disability, sexual orientation, gender identity, HIV status, marital status, past or recent military status or any other status protected by the laws or regulations in the locations where we operate.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we comply with our due diligence processes as outlined in the Graham Holdings Company Statement of Ethical Principles, Code of Business Conduct, Whistleblowing Policy and the Kaplan International Human Resources policy documentation.

We have systems in place designed to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains in conducting background checks through World Check-One;
- Monitor potential risk areas in our supply chains;
- Protect whistle blowers and report unethical conduct; and
- Where possible we build long standing relationships with our supply chains nationally and internationally and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking and ensure all those in our supply chain and contractors comply with our ethics.

We have dedicated representatives that are aware of the requirements of Modern Slavery Act and the principles of human rights from the following departments:

- Legal;
- Audit and Compliance; and
- Human Resources.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff including Senior Management Teams.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Effective use of the Recruitment and Selection Policy;
- Use of labour monitoring and payroll system;
- Completion of audits conducted by internal and external auditors; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes **Aspect International Language Academies Limited**'s slavery and human trafficking statement for the financial year ending 2018. Aspect International Language Academies Limited is a subsidiary within the Kaplan group.

David Jones

Director of **Aspect International Language Academies Limited**