

Ark and Ark Schools Modern Slavery

Monitoring and Enforcement

Our internal auditor carries out regular testing of internal procedures and controls. Any areas of non-compliance are included in internal audit reports, which are communicated to senior managers and the Risk and Audit Committee, and appropriate action is taken. This is further tested through our external auditors.

If it is believed or suspected a breach of this Policy Statement has occurred or that it may occur, staff are requested to notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible. If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they are asked to raise it with the HR or Procurement team as appropriate.

Any employee who breaches this Policy Statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy under the organisation's Disciplinary Policy.

Responsibility

This Statement is reviewed at Board level. The HR team has day-to-day responsibility for implementation within our own business and the Procurement team for implementation within our supply chain.

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| L | ucy Helle | er, Chief E | excutive | | |

Date: 25.05.2023

Date of last review: April 2023 **Date of next review:** April 2024