

Modern Slavery Act 2015

Slavery and Human Trafficking Statement

This statement is published by Aurora Care and Educations Holdings Limited and its subsidiaries ("The Aurora Group," listed in Appendix 1), pursuant to section 54(1) of the UK Modern Slavery Act 2015 (MSA 2015). This statement reports on what we do to mitigate the risk of slavery, servitude and forced, bonded or compulsory labour, human trafficking, sexual exploitation, and child labour ('modern slavery') within our operations and supply chain.

Pursuant to the requirements of the Act, it has been approved by the board of directors and is signed by the Chief Executive Officer on behalf of the aforementioned group and constitutes a Modern Slavery and Human Trafficking Statement for the financial year ending 30 April 2025 and is our fifth Modern Slavery Statement.

It can be found at the bottom of the Aurora Groups website <https://www.theauroragroup.co.uk/> and on the UK Government registry <https://modern-slavery-statement-registry.service.gov.uk>

About the Aurora Group

The Aurora Group consists of Aurora Care and Educations Holdings Limited, and 14 subsidiary companies; all these legal entities are managed and administered by the same board of directors. The Aurora Group's share holder and financial backer is the [Octopus Group](#), a privately held UK-based investment and entrepreneurial company founded in 2000. It operates across multiple sectors including financial services, energy, real estate, and education, with a strong focus on impact-driven businesses.

At The Aurora Group, we believe in giving people the opportunities they need to lead fulfilling, independent lives. Established in 2015, we are an innovative, high-quality provider of education, care and support for children, young people and adults with special educational needs (SEND), additional needs, and disabilities. We have now grown to be one of the largest providers within the SEND sector, and we are still investing in the sector by increasing the number of schools, colleges, and homes we have across the UK providing a wide range of services and facilities.

We work in partnership with each child, young person, and adult to deliver personalised education, care and support which best complements their unique set of skills and abilities. Our shared mission across the group is to enable all children and young people to thrive and fulfil their aspirations.

Across our network of innovative schools, colleges and residential homes, our dedicated and experienced staff work in collaboration with specialist teams of professionals to enable every young person to explore and develop their own unique talents, skills, and abilities.

We are proud to be a certified B Corp

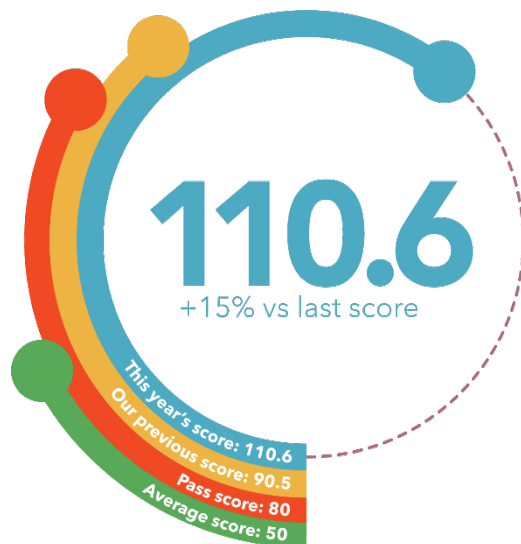


The Aurora Group is a certified B Corp. B Corp is a new kind of business. The 'B' stands for 'Benefit for all'. Simply put, it means we operate with purpose, not just to make a profit. Our company articles of association have been updated to make this commitment from us legally binding into the future.

Certified B Corporations, or B Corps, are companies independently verified by B Lab, a global non-profit network, which have demonstrated and met high standards of social and environmental performance, transparency, and accountability.

B Corp is a worldwide movement of over 8,700 companies, all striving for positive change for the world around us. To become a B Corp, a business needs to have the right values in place to begin with and our corporate objectives closely align with the B Corp values.

How do we score as a B Corp?



We are proud to announce that our overall impact score of 110.6 (up 22.2% from 90.5), places us at the forefront among UK benchmarks, our sector, and companies of similar size.

Business as a force for good.

As a certified B Corp, we have amended our Articles of Association to reflect our commitment to positively impacting society and the environment through our business and operations. This legally binds us to use business as a force for good.

People are at the heart of our business.

As a certified B Corp, we know that people are at the heart of our business, and taking care of them is important. Our people-first approach acknowledges that our employees are the driving force behind our company's mission.

Rooted in community.

Community is at the core of our B Corp business. Engaging and supporting the wider collective influences the various small and large decisions we make each day. From actively managing diversity in hiring to creating an inclusive workplace, we are dedicated to enriching our community.

Creating a sustainable future.

As a certified B Corp, we are taking action on our environmental impact and are committed to achieving net zero by 2030. To do this, we are taking several actions,

including updating our vehicle fleet to be 100% electric, establishing a net zero supply chain, and reducing our use of energy, water, and waste.

Driven by purpose.

As a certified B Corp, our mission is deeply rooted in purpose. Our customers are at the heart of everything we do. We believe in giving people the opportunities they need to lead fulfilling, independent lives. We strive to achieve this for each and every young person who benefits from our services.



Our Mission, Vision, Values, and Awards at Aurora

Our Mission is to provide innovative, high-quality education, care, and support, enabling all children and young people to thrive and fulfil their aspirations.

Our Vision is to be trusted as the provider and employer of choice, transforming the lives of a growing number of children and young people.

Our Values Each of our schools, colleges and residential homes retains its own unique identity while embracing and embodying The Aurora Group's core values:



We are caring - We understand that your experience in mainstream care and education may have been a difficult one. We take seriously our responsibility for the children and young people in our care, and are committed to making your time with us as positive and fulfilling as possible.



We are ambitious - We have high expectations of all our children and young people, regardless of what barriers they may have faced in the past. We encourage them to expect more for themselves, while challenging employers and communities to understand and value their diverse needs and attributes.



We are collaborative - Everything we do, we do in partnership with you. We actively seek and listen to feedback from students, parents and staff, to find out what's working well, what we can do better, and how we can further develop all our services to benefit the people we work with.



We are trusted - Our business is funded by ethical investors. They understand that sustainable growth is possible only when we hold ourselves to the highest standards, by delivering consistently top-quality services to every single person we work with.

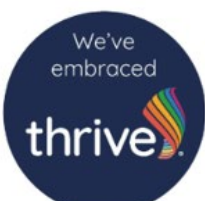


We are innovative - We begin planning for each young person's future the minute they walk through our doors. We tailor our approach to their unique needs, and are constantly looking for new opportunities to help them explore, enhance and employ their own skills, talents and abilities.

Our Awards

Passionate about enriching the lives of our children, young people and adults with special educational needs, additional needs, and disabilities, we're proud of our awards and accreditations, which recognise not only the work of our incredible teams of employees, but also the children, young people and adults in Aurora's care.

We strive to be the best in what we do, and our awards and accreditations are testaments to our achievements.





Policy Statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as Human Trafficking, Forced or Compulsory Labour, Bonded Labour or Debt Bondage, Child Slavery or Exploitation, Forced and Early Marriage, Criminal Exploitation, Domestic Servitude, Sexual Exploitation, and Descent-based Slavery.

The Aurora Group has a zero-tolerance approach to all forms of modern slavery, human trafficking, and child labour, and is committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place anywhere within our business.

We expect the same high standards from all our contractors, suppliers, and other business partners. Furthermore, we expect that our suppliers will hold their own suppliers to the same high standards.

Supporting Employment Legislation

To ensure Aurora's practices align with the Modern Slavery Act, we comply with all applicable employment legislation, including laws relating to minimum/living wages, and the working time directive; these include, but are not limited to:

- Employment Rights Act 1996
- National Minimum Wage Act 1998
- Working Time Regulations 1998
- Equality Act 2010
- Immigration, Asylum and Nationality Act 2006

Policies we Operate at Aurora

The Group is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships. We operate employment policies and

procedures that are designed to treat all individuals who work within The Aurora Group with dignity and respect, to reward them fairly for their work and not to exploit them.

We operate several internal policies and reports to ensure that we are conducting business in an ethical and transparent manner; these include, but are not limited to:

- Complaints Policy
- Capability Policy and Procedure
- Dignity at Work Policy
- Equality, Diversity & Inclusion Policy
- First-Aid and Health & Safety Policy
- Gender Pay Gap Report for 2021-25
- Modern Slavery Act Statement 2021-25
- Suspension & Permanent Exclusion Policy
- Whistleblowing Policy
- Grievance Policy
- Child Protection Policy
- Adult Safeguarding Policy
- Risk and Governance Framework
- Environmental & Sustainability Policy
- Health & Safety Policy
- Risk Assessment Policy
- Anti-Bribery Policy

Combating Modern Slavery in Our Supply Chains

The Aurora Group is based in the UK and procures goods and services wholly from a UK supplier base; we have identified that some of our procurement takes place within sectors where modern slavery offences could occur, such as the construction industry, office & educational supplies, ICT equipment, building materials & consumables, and soft facilities such as catering and cleaning.

To combat modern slavery in Aurora's supply chains, our procurement team has adopted a multi-layered, proactive strategy aligned with the Modern Slavery Act 2015 and current best practices. Here is a comprehensive approach based on the latest UK government guidance and industry insights:

Addition of MSA Clauses in All Contracts

Our general T&C's and Contract T&C's contain clauses where the supplier undertakes, warrants, and represents that it shall comply with the MSA 2015 fully; when contracting under a supplier's T&C's we insist that our contract clause pertaining to MSA 2015 is added to their T&C's.

Due Diligence

To identify and mitigate the risks of modern slavery, we have established a due diligence process of verification, investigation, and risk assessment of potential suppliers; before entering into an agreement or contract, to confirm all relevant facts and financial information; and to verify anything else that could be either a risk, or an opportunity. This due diligence process is also required for the regular review of existing suppliers, to identify signs of supplier distress which could cause risk to Aurora's supply chain.

Supplier Code of Conduct

In addition, we insist our suppliers sign a “Supplier Code of Conduct” which forms part of any contract entered into and sets out the standards and behaviours that are expected from our suppliers, including a commitment to respectful treatment, and professional and ethical behaviour, along with safe, sustainable, and fair business practices. If we feel a supplier is not able to reach our standards, we will refrain from working with them.

Monitoring and Auditing

The Aurora Group’s procurement team plays a critical role in identifying and mitigating modern slavery risks through robust monitoring and auditing practices. Our approach focuses on:

1. Prioritising High-Risk Areas

- a. High-risk suppliers (based on geography, industry, or labour intensity).
- b. Our top 100 suppliers by annual spend.
- c. Critical contracts with large spend or strategic importance.

2. Deploying Self-Assessment Questionnaires (SAQs)

To gain deeper insight into supplier practices, policies, and procedures, we issue tailored SAQs that request information on:

- a. General Business Information
- b. Information on modern slavery act qualification and compliance.
- c. Information on Legal Compliance & Confirmation that the supplier complies with all laws and regulations applicable to its business, in all countries it operates and procures Goods.
- d. Ethics Information
 - i. Human Rights policies
 - ii. Conflict Minerals & Counterfeit Materials policies
- e. Suppliers Sustainability Ambitions
- f. Emissions Information

Group Procurement Policy and Procedures

Aurora has introduced robust procurement policies and procedures governed by UK laws, and regulations, which must be adhered to in all procurement activities by all of its Services and Central Departments.

Supplier Ethics & Emissions

The Aurora group is committed to being an environmentally responsible company and achieving net zero by 2030. Aurora aims to work collaboratively with suppliers to procure the works, goods, and services it needs in the most sustainable way possible, and to help reduce risk within the supply chain, while helping to reduce the impact of modern slavery around the world.

To support this commitment Aurora has conducted Supplier Ethics & Emissions Questionnaires, which seek responses and assurances from suppliers on Legal Compliance (in all countries they operate), the Modern Slavery Act, Human Rights, and the use of Conflict Minerals & Counterfeit Materials. Additionally, suppliers are

asked about Greenhouse Gas Emissions, whether they are measuring them already, or whether they will measure them in the future; and how they plan to reduce their emissions long term.

Employees

The Aurora Group recognises that the people we employ within our central teams and across our operations, are the key component of our business success; the Group also recognises the potential for slavery and human trafficking to affect employees working within the business.

To ensure its employees are not subject to undue influence and are treated with dignity and respect, the Aurora Group has robust HR policies and procedures in place across all its operations. The Aurora Group is committed to ensuring that all staff receive fair remuneration for the job they perform; the group offers its staff a range of benefits including a Healthcare Cash Plan, an Employee Assistance Programme, and Fully funded training & qualifications.

The Aurora Group expects its employees, workers, business partners, and customers to report concerns of non-compliance, no matter how trivial, in line with established policies and procedures. The Aurora Group's Whistleblowing Policy is designed to make it easy for disclosures to be made without fear of retaliation.

Due to the nature of our business, the Aurora Group has robust, and strict recruitment processes, which include full DBS checks, verifying the identity of each employee and their right to work in the United Kingdom before commencing employment. All temporary workers are supplied through specified reputable recruitment agencies.

Responsibility for this statement

The Board of Directors has overall responsibility for this statement and compliance with MSA 2015 and ensuring the Aurora Group complies with both our legal and ethical obligations; together with the responsibility that all those in our employment comply with it.

Managers at all levels of the organisation are responsible for ensuring those reporting to them understand and comply with MSA 2015 and are given adequate and regular training on the issue of modern slavery in supply chains.



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Kelvin Donald
Chief Executive Officer, The Aurora Group
12th September 2025

APPENDIX 1 - THE AURORA GROUP STRUCTURE

