

Aurora

Modern Slavery Act 2015

Slavery and Human Trafficking Statement

This statement is made under section 54(1) of the Modern Slavery Act 2015 (MSA 2015). It is made on behalf of Aurora Care and Education Holdings Limited and its subsidiaries (“The Aurora Group”) on 26th September 2024. It is signed by the Chief Executive Officer on behalf of the aforementioned group and constitutes a Modern Slavery and Human Trafficking Statement (“Statement”) for the financial year ending 30 April 2024.

About the Aurora Group

At The Aurora Group, we believe in giving people the opportunities they need to lead fulfilling, independent lives. We are an innovative, high-quality provider of education, care and support for children, young people and adults with special educational needs and disabilities. We have a growing number of schools, colleges and homes 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.

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 8,000 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.

Our Mission, Vision, and Values 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

 CARING	We show kindness and concern for others and consider the implications of our actions.
 AMBITIOUS	We challenge ourselves to be the best, thinking big and taking personal responsibility for achieving our goals.
 COLLABORATIVE	We achieve successful outcomes by involving the right team of people to get the job done.
 TRUSTED	We act consistently, fairly and openly in a way that others can rely on.
 INNOVATIVE	We constantly seek new and creative ideas and solutions to make our workplace the best it can be – for now and the future.

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

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 comply with all applicable employment legislation, including laws relating to minimum/living wages, and the working time directive. 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
- Equality, Diversity & Inclusion Policy
- First-Aid and Health & Safety Policy
- Gender Pay Gap Report for 2020-23
- Modern Slavery Act Statement 2020-23
- Suspension and 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.

The Aurora Group is committed to understanding its supply chains better and seeks to achieve greater transparency throughout its supply chains, with the aim of ensuring the risk of modern slavery and human trafficking is minimised across its supply chains. Aurora does this by:

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.

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.

A handwritten signature in blue ink, appearing to read 'Mark Costello', with a long horizontal line extending to the right.

Mark Costello
Chief Executive Officer, The Aurora Group
26th September 2024