

# **Statement under Section 54(1) of the UK Modern Slavery Act 2015 for Seckloe 208 Limited and all its relevant group of companies (the "QA Group"\*).**

**2026/2027**

## **1. Introduction**

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.

We have a zero-tolerance approach and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing procedures to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## **2. Structure of the organisation**

The QA Group provides learning and education services in three principal areas which are QA Learning, QA Apprenticeships and QA Higher Education.

QA Learning provides a broad range of business and technical skills courses to public and private sector clients at training centres throughout the UK and online, QA Apprenticeships works with employers in the UK to provide apprenticeships leading to technical and business skills qualifications and QA Higher Education provides degree courses to domestic and international students at campuses in London, Birmingham and Manchester..

In the relevant financial year, we had on average 2150 employees and an annual turnover in excess of £337 million. To find out more about the nature of our business, please visit <https://www.qa.com/>.

In order to provide services to clients, we work with a range of suppliers including but not limited to professional service firms, utility suppliers, IT vendors, consultants, industry business partners and technology platform providers.

## **3. Policies**

As part of our commitment to combating modern slavery, we have implemented the following policies and procedures:

1. QA Group Modern Slavery Policy
2. Whistleblowing Policy
3. Corporate Social Responsibility Policy
4. Supplier Decision Tree Matrix
5. Supplier Questionnaires
6. QA Group Supplier Governance Policy
7. QA Group Supplier Code of Conduct

We also make sure our suppliers are aware of our policies and adhere to the same high standards. These policies have been developed by our legal, HR, finance and IT teams.

*\*Group Companies Covered: QA Limited, QA HE Limited, QA Talent Limited, Circus Street London Limited and each of their individual operating subsidiaries.*

## 4. Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

1. Suppliers must complete questionnaires which elicit responses on their legal compliance with all applicable legislation;
2. Standard contractual language regarding a supplier's compliance with all applicable legislation; and
3. If necessary, periodic audits on certain suppliers to ensure compliance.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistle-blowers.

## 5. Risk and compliance

We do not consider that we operate in high-risk sectors or locations because of the nature of the services we provide and the location and composition of our suppliers.

We ensure all our suppliers adhere to our Modern Slavery Policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies which contain or reflect anti-slavery measures, we will immediately seek to terminate our relationship with the relevant supplier.

## 6. Training

We are raising awareness and continually taking time to invest in educating our staff in order to recognise the risks of modern slavery and human trafficking in our business and supply chains. Training is repeated for all staff annually (with necessary updates) to ensure we remain vigilant.

## 7. Further actions and sign-off

As part of our ongoing commitment to preventing slavery or human trafficking from occurring in our business or supply chains, we intend to undertake a periodic review of our Modern Slavery Policy to ensure it remains robust.

This statement is made in accordance with **section 54(1)** of the Modern Slavery Act 2015 and constitutes the QA Group's slavery and human trafficking statement for the financial year ended 31 May 2026.

This statement was approved by the board of directors of Seckloe 208 Limited.

Signature:

*Peter Franklin*

Peter Franklin – Director, Seckloe 208 Limited

Date: 26 May 2026