PGL Beyond Modern Slavery Statement 2026

Document Control

Policy Owner	Version No.	Date	Next Review
Procurement	2	September 2026	January 2028

1.0 Our Business

As a family of leading educational travel brands – PGL, NST, European Study Tours and StudyLink Tours - we've been enriching the lives of young people for over 65 years.

Together, we get young people out there – beyond the classroom – with amazing experiences that help them reach beyond their own expectations to realise how brilliant they are.

We work with schools, multi-academy trusts and educational leaders to support the journey of progression from KS2 to graduate age.

2.0 Our Purpose & Values

All brands within the PGL Beyond network have a shared purpose: 'to enrich young people's lives' and we use this, alongside our core values, to help guide our decision making.

Our group-wide values of quality, respect, safety, inclusivity, teamwork and fun, help us develop the ethical framework within which we operate. These values guide our decisions, define our beliefs and underpin everything we do as an organisation.

We want to make a positive difference in the education sector; nurturing long-standing relationships with our customers, colleagues, suppliers and partners through mutual trust, loyalty and a commitment to delivering our products and services with integrity.

3.0 Our Policies

As a responsible, global business, we're passionate about being a force for good in all areas of our operation. We are committed to working with our business partners and suppliers to ensure all workplaces within our supply chain are free of Modern Slavery (MS).

The following robust policies are in place and form part of PGL Beyond's approach to identify and prevent slavery occurring in any part of our business. We choose to work with suppliers that not only share our ethical approach to business, but who are prepared to work with us to reach our goals with regards to the Modern Slavery Act (MSA).

As a group of brands, the PGL Beyond network is complex and multi departmental. Our approach has been to start with the departments where the risk level is potentially higher and work across all areas of the business on an ongoing rolling basis to ensure that no area is left out of the process. These policies apply to PGL Beyond and its family of brands – PGL Travel Ltd., NST, European Study Tours and StudyLink Tours,

and any associated companies trading worldwide (primarily in the UK, Ireland, France and Australia).

3.1 Anti-slavery and Human Trafficking Policy

We set out clear terms and expectations for all contractors, suppliers, and other business partners. We strive to ensure the prevention of forced, compulsory or trafficked labour, as well as anyone held in slavery or servitude. We have a zero-tolerance approach.

3.2 Anti-Corruption and Whistleblowing Policy

We actively encourage all colleagues, customers, and other business partners to report any concerns related to the direct activities or supply chains of PGL Beyond and its network of brands. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of being victimised for doing so. This position will be strengthened with colleague updates as we progress with our policy implementation.

3.3 Procurement Policy

PGL Beyond is developing a Procurement Policy that covers all aspects of our global sourcing activity. Suppliers are accessed and placed within specific risk categories. Embedded within this is a
Modern Slavery Adherence Policy which sets out the level of assurance required by each level of risk.

High-risk suppliers who mainly operate outside the EU are required to demonstrate they are free of slavery by undertaking independent audits that cover the following points:

- Working Hours Child Labour Forced Labour Prison Labour
- Disciplinary Measures
- Freedom of Association and Collective Bargaining Discrimination
- Harassment and Abuse
- Transparency in Supply Chain

Audits are reviewed and followed-up to ensure that any areas of concern are corrected in a timely manner, in line with auditing house recommendations. PGL Beyond understands not all suppliers will be perfect straight away, therefore a collaborative approach is taken to work towards common goals, to ensure there is no slavery within any part of our supply chain.

4.0 Due Diligence

We take our responsibilities with MS very seriously and continue to develop a programme to map the supply chain, to assess particular products or geographical risks of MS and trafficking. Once areas of risk have been analysed, actions can be

taken in line with our policies and procedures for the procurement of goods and services.

Independent factory auditing systems provide the procurement team with details on how each area performs and scores, whilst alerting the team to any problematic areas as part of our due diligence. We encourage our suppliers to complete these audits and actively work together to develop mutual goals which constantly improve conditions across the board, especially in our high-risk areas.

5.0 Risk Assessment & Management

As a company, we understand the need to constantly assess the risks of MS within all areas of our business and actively take steps to review where the greatest risks come from. When a contract is being negotiated; whether it be goods or services, the potential new supplier must demonstrate their approach to ensure a supply chain that is clear of MS. Business practices and ethics are reviewed and assurances sought, to ensure compliance. The procurement team currently works within these parameters and we are working to ensure that other departments also work within this framework.

6.0 Key Performance Indicators and Effectiveness

- Risk assessment is undertaken within the procurement department to highlight areas of most concern. This will be rolled out across the group.
- The high-risk category is reviewed on a regular basis and any changes or problems with compliance monitored. We take action if our requirements are not met and suppliers will and have been removed from our supplier database.
- A supplier database is under development and will be updated on a regular basis to ensure that we are up to date with supplier audits. This is currently populated with data from the procurement department, however, will include other departments going forward.
- As a group we have no evidence of MS within our business, however we are not complacent, and continually look to the future to set ourselves new goals to improve the lives of everyone involved in the PGL Beyond network and our supply chain to ensure they are free from slavery.

7.0 Training on Modern Slavery and Trafficking

We have been working to raise awareness of modern slavery amongst our employees since the act came into force.

Every new colleague undergoes an induction course upon joining PGL Beyond. A section is dedicated to the Modern Slavery Act and addresses the issues we face as a business, outlines how colleagues can help and what the signs are to look out for in MS.

All colleagues are required to complete annual in-house training on modern slavery to ensure compliance and understanding.

8.0 Review and approval

This policy will be reviewed and approved by the Board of Directors and revised as necessary to reflect changes in laws, regulations, supply chain, technology, customer profile or organisational values.