

The Edward James Foundation Modern Slavery and Human Trafficking Statement 2024/25

Introduction

The Edward James Foundation (the “Foundation”) recognises that modern slavery is a global issue and it does not engage in, or condone, the practices of human trafficking, slavery or forced labour.

The statement below is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps taken by the Foundation during the year ended 30 September 2025, to ensure transparency in its supply chain and to prevent modern slavery and human trafficking taking place in its supply chains or in any part of its business.

This statement has been approved by the Audit Committee through its delegated power from the Board of Trustees.

Structure and Operations

The Foundation is a private company, limited by guarantee, and incorporated in England and Wales.

Our charitable activities are carried out directly by the Foundation. The charitable activities comprise:

- The operation of West Dean College, which provides fine arts, crafts, heritage conservation and design education, delivered by way of formal degree, diploma and certificate programmes as well as short courses.

- The management of a 6,500-acre estate comprising a mix of parkland, farmland, woodland and residential property.

Trading activities, principally retailing, conferencing and hospitality, are carried out through West Dean Limited, a wholly owned subsidiary. The trading activities of West Dean Limited utilise spare capacity in the Foundation's land and buildings to generate profits which are then donated to the Foundation to support its objects. The Foundation has one further wholly owned subsidiary, KLC Limited, which is a non-trading company that previously held the trade and assets of the KLC School of Design, prior to their transfer to the Foundation.

Our activities take place at our campuses in West Sussex and Central London. We have, on occasion, delivered services in overseas locations, typically consultancy or direct teaching, using our own staff.

The Board of Trustees is responsible for the strategic direction of the Foundation. The Chief Executive and Principal has overall operational responsibility, supported by the Executive Leadership Team.

Supply Chains

The Foundation maintains a number of large supply contracts which are managed centrally. These include the rental of a London property from the University of London, the supply of degree validation services from the University of Sussex, and utilities contracts with established UK suppliers. Given our relatively small scale, we do not currently operate a formal Procurement department, but major contract awards are conducted through in-house tendering, with the close involvement of the Executive Leadership Team.

Given the nature of the core campus and wider estate, the Foundation from time-to-time undertakes major capital works, drawing on the services of architects, builders and other relevant contractors. These suppliers are contracted in line with the approach outlined above but carry an inherent risk from their tendency to engage sub-contractors to deliver the work. In such cases, we are committed to working with the main contractors to identify and report any non-compliance and to work with all statutory bodies should any investigations arise

Approximately 50% of our operating cost base relates to staff costs and the Foundation is committed to treating all staff fairly. For example, the Foundation aims to pay the recognised Living Wage. Further, functions such as cleaning, catering and security, which many organisations outsource to third party suppliers, are all conducted in-house such that the Foundation has direct control over them.

Transactional purchasing is devolved to individual departments and staff are required to follow our Anti-Slavery and Human Trafficking Policy when making purchases. Areas of risk include the purchase of supplies for teaching given the nature of the raw materials that students work with.

Policies and Due Diligence on Slavery and Human Trafficking

We are committed to acting ethically and with integrity in all our activities and to implementing and enforcing effective systems and controls to ensure slavery and human

trafficking are not taking place in our business or anywhere in our supply chains. We have adopted the following policies in support of this goal:

- Anti-Slavery and Human Trafficking Policy
- Anti-Corruption and Bribery Policy
- Counter Fraud Policy
- Conflict of Interest Policy
- Safeguarding Policy
- Whistleblowing Policy
- Dignity at Work Policy

The Foundation requires all trustees and staff to comply with these policies.

In addition to setting our own relevant policies and publishing our own Modern Slavery Statement, the University interrogates Statements from our suppliers as part of its due diligence processes.

Areas of focus for 2025/26

Work will continue during 2025/26 to ensure compliance with the Act, with a focus on:

- Developing our approach to supplier due diligence
- Identifying and assessing potential risk areas in our supply chains.
- Confirming our suppliers have in place suitable anti-slavery and human trafficking policies and processes.
- Protecting whistle blowers and reporting unethical conduct.