



MODERN SLAVERY STATEMENT

Effective date: 20 February 2026

Last updated: 23 July 2026

1. Introduction

Athena GESDA Ltd is committed to conducting its business ethically, responsibly and with respect for human rights.

We oppose all forms of modern slavery, human trafficking, forced labour, compulsory labour, servitude, debt bondage, child labour and the exploitation of workers.

We are committed to taking proportionate and practical steps to reduce the risk of modern slavery occurring within:

- our own business;
- the services we provide;
- our business relationships;
- our international operations; and
- our supply chains.

This statement describes our approach to identifying, preventing and addressing modern slavery risks.

Athena GESDA currently publishes this statement voluntarily as part of its commitment to responsible and transparent business practices. We will review our legal reporting obligations as the business grows and as applicable legislation changes.

2. About Athena GESDA

Athena GESDA Ltd is a UK-based international education consultancy.

Our work supports universities, educational institutions, schools, businesses, public bodies and other organisations with internationalisation, student recruitment, partnerships and institutional development.

Our services may include:

- international student recruitment strategy;
- international market-entry consultancy;
- university partnership development;
- international education roadshows;
- school and university engagement programmes;
- leadership immersion programmes;

- training and professional development;
- counsellor engagement and certification;
- university-industry-government collaboration;
- Global Capability Centre advisory and operational support;
- admissions and conversion support;
- international events and conferences;
- employability and enterprise programmes;
- research and innovation partnerships;
- international mobility programmes; and
- strategic education consultancy.

Company name: Athena GESDA Ltd

Company number: 17044526

Registered office: 71 Prospect Street, Nottingham, NG7 5QE, United Kingdom

Principal country of operation: United Kingdom

Website: www.athenagesda.org

Email: info@athenagesda.org

3. Purpose of this Statement

The purpose of this statement is to explain the steps Athena GESDA takes, and intends to continue developing, to:

- understand modern slavery risks;
- identify areas of potential vulnerability;
- exercise appropriate due diligence;
- establish clear expectations for suppliers and partners;
- encourage concerns to be reported;
- respond appropriately where a concern arises; and
- continuously improve our approach.

Our measures are designed to be proportionate to the size, resources, activities and risk profile of Athena GESDA.

4. What We Mean by Modern Slavery

Modern slavery is an umbrella term covering serious forms of exploitation in which a person is controlled or deprived of freedom for another person's benefit.

It may include:

- slavery;
- servitude;
- forced or compulsory labour;
- human trafficking;
- debt bondage;
- forced recruitment;
- forced marriage connected with exploitation;
- the worst forms of child labour;
- withholding identity documents;
- restriction of movement;
- threats, intimidation or violence;
- deceptive recruitment;
- recruitment-fee exploitation;
- withholding wages;
- excessive or involuntary overtime; and
- other practices that prevent workers from leaving employment freely.

Modern slavery may affect people working directly for an organisation or indirectly through suppliers, contractors, agencies, intermediaries or international supply chains.

5. Our Organisational Structure

Athena GESDA is an independent international education consultancy headquartered in the United Kingdom.

Our business may be supported by:

- employees;
- self-employed consultants;

- independent contractors;
- local delivery partners;
- educational institutions;
- event organisers;
- travel and accommodation providers;
- venues;
- technology providers;
- marketing and communications providers;
- professional advisers; and
- other specialist suppliers.

We operate internationally and may deliver activities in the United Kingdom, Europe, South Asia, Southeast Asia, Africa, the Middle East and other regions.

As Athena GESDA grows, our organisational structure, geographical reach and supply-chain relationships may change. We will review our modern slavery controls accordingly.

6. Our Supply Chains

As a professional-services business, Athena GESDA does not manufacture physical products.

Our principal supply-chain relationships may include:

- consultants and contractors;
- event-management providers;
- local programme-delivery partners;
- schools, universities and education organisations;
- venues and conference facilities;
- hotels and accommodation providers;
- airlines and transport providers;
- travel-management companies;
- catering providers;

- marketing, design and printing suppliers;
- technology and software providers;
- website and cloud-hosting providers;
- payment processors;
- recruitment and staffing providers;
- photographers and media providers;
- security providers;
- professional advisers; and
- office and administrative suppliers.

Some suppliers may subcontract elements of their services to other businesses or individuals.

Our greatest potential exposure to modern slavery risk is more likely to arise indirectly through extended international supply chains than through our own direct operations.

7. Our Commitment and Standards

Athena GESDA expects everyone working for or with the company to:

- act lawfully and ethically;
- respect internationally recognised human rights;
- provide safe and fair working conditions;
- prohibit forced or involuntary labour;
- prohibit human trafficking;
- prohibit unlawful child labour;
- permit workers to leave employment subject to lawful contractual notice;
- pay workers in accordance with applicable laws;
- avoid unlawful discrimination and harassment;
- provide transparent employment terms;
- comply with working-time and minimum-wage requirements;
- avoid exploitative recruitment practices;

- protect workers from retaliation for raising concerns; and
- cooperate with reasonable due-diligence enquiries.

We will not knowingly work with an organisation or individual involved in modern slavery, human trafficking or serious labour exploitation.

8. Governance and Responsibility

Responsibility for overseeing Athena GESDA's approach to modern slavery rests with its Founder and Chief Executive Officer or another designated senior leader.

Responsibilities include:

- approving this statement;
- reviewing material modern slavery risks;
- ensuring that proportionate policies and processes are maintained;
- reviewing serious concerns or allegations;
- determining appropriate remedial action;
- considering modern slavery in material supplier decisions; and
- monitoring the development of Athena GESDA's approach.

All individuals working for Athena GESDA are expected to support these commitments.

Where Athena GESDA appoints employees, consultants or managers with procurement, supplier-management or programme-delivery responsibilities, they will be expected to consider modern slavery risk within their areas of work.

9. Related Policies and Procedures

Our approach to modern slavery may be supported by the following policies and procedures:

- Terms and Conditions;
- Anti-Bribery and Corruption Policy;
- Equality, Diversity and Inclusion Policy;
- Safeguarding Policy;
- Privacy Policy;
- supplier onboarding and due-diligence procedures; and

- contractual terms with suppliers and delivery partners.

Where these documents have not yet been implemented, Athena GESDA intends to introduce them proportionately as its operations and supplier network develop.

This statement should not be interpreted as claiming that every policy listed above is already separately documented unless it has been formally approved and adopted.

10. Risk Assessment

We assess modern slavery risk by considering factors such as:

- the country in which a supplier operates;
- the nature of the goods or services being supplied;
- the use of temporary, migrant or low-paid labour;
- reliance on recruitment agents or labour intermediaries;
- complex subcontracting arrangements;
- the level of visibility over the extended supply chain;
- the use of outsourced hospitality, cleaning, security or transport services;
- short delivery deadlines or significant price pressure;
- the use of informal or cash-based labour;
- reports of labour-rights concerns;
- the supplier's policies and governance arrangements; and
- whether workers may be required to pay recruitment fees.

Risk assessments will be proportionate to the value, duration, location and nature of the relationship.

We recognise that a low-value supplier may still present a high human-rights risk and that financial value alone is not an adequate measure of exposure.

11. Areas of Potentially Higher Risk

The following areas may present comparatively greater modern slavery risks within our extended supply chain:

11.1. Hospitality and accommodation

Hotels, catering providers, cleaning services, laundry services and event venues may rely on outsourced, temporary or migrant labour.

11.2. Travel and transport

Transport, logistics, drivers and local travel services may involve subcontracting or informal labour arrangements.

11.3. Events and temporary staffing

Large events may rely on short-term staff, agency workers, security personnel, hospitality staff and casual labour.

11.4. Construction and venue operations

Some venues and institutional partners may rely on facilities-management and construction supply chains involving multiple subcontracting tiers.

11.5. Printing, merchandise and promotional materials

The production of clothing, merchandise, electronics, printing materials and promotional products may involve global manufacturing supply chains.

11.6. Technology and electronic equipment

Hardware, devices and other electronic products may include raw materials or manufacturing processes sourced through complex international supply chains.

11.7. International recruitment intermediaries

Recruitment agents or labour providers may create risks where workers are charged inappropriate fees, misled about employment terms or placed in exploitative arrangements.

Identifying a sector or country as presenting higher risk does not mean that exploitation is occurring. It means that additional care or due diligence may be appropriate.

12. Supplier and Partner Due Diligence

Our supplier and partner due diligence may include, where proportionate:

- confirming the supplier's legal identity;
- understanding its ownership and business activities;
- reviewing relevant policies or statements;
- asking whether it uses subcontractors or labour agencies;
- considering the countries and sectors involved;
- requesting confirmation of compliance with labour laws;

- reviewing adverse media or publicly available information;
- seeking references;
- discussing employment and recruitment practices;
- assessing whether workers pay recruitment fees;
- asking how concerns can be reported;
- including contractual compliance obligations; and
- requiring clarification or corrective action where concerns arise.

The extent of due diligence will depend on the risk and materiality of the relationship.

Not every supplier will require the same level of review.

13. Supplier Expectations

Athena GESDA expects suppliers, contractors and Partners to:

- comply with applicable modern slavery and human-trafficking laws;
- prohibit forced, bonded and involuntary labour;
- prohibit unlawful child labour;
- ensure workers are free to leave employment in accordance with the law;
- provide workers with clear employment terms;
- pay legally required wages and benefits;
- comply with working-time laws;
- avoid retaining passports or identity documents improperly;
- prohibit worker-paid recruitment fees where such fees create exploitation;
- provide safe and respectful working conditions;
- investigate credible concerns;
- protect individuals who raise concerns in good faith;
- maintain appropriate records;
- apply equivalent standards to relevant subcontractors; and
- notify Athena GESDA of any material modern slavery concern connected with our Services.

We may include these expectations within contracts, purchase orders, engagement letters or a separate Supplier and Partner Code of Conduct.

14. Contractual Controls

Where appropriate and proportionate, contracts with suppliers or Partners may require them to:

- comply with all applicable anti-slavery and human-trafficking laws;
- maintain suitable policies and controls;
- conduct appropriate due diligence within their own supply chains;
- maintain records demonstrating compliance;
- notify Athena GESDA of suspected or confirmed violations;
- cooperate with reasonable investigations;
- take corrective action;
- provide relevant information on request; and
- permit suspension or termination in the event of a serious breach.

Contractual clauses alone do not eliminate modern slavery risk. They form part of a wider approach involving risk assessment, communication, due diligence and remediation.

15. Recruitment and Employment Practices

Athena GESDA is committed to fair and lawful recruitment practices.

Where we recruit employees, contractors or consultants, we aim to:

- verify identity and right-to-work documentation where required;
- provide clear written terms;
- explain the nature of the role and payment arrangements;
- avoid misleading recruitment practices;
- pay agreed Fees or remuneration promptly;
- avoid unlawful deductions;
- prohibit confiscation of identity documents;

- prohibit charging workers recruitment fees for obtaining work with Athena GESDA;
- provide appropriate routes for raising concerns; and
- engage reputable recruitment intermediaries where used.

Independent contractors must be genuinely free to accept or decline work in accordance with their contractual arrangements and applicable law.

16. International Partners and Programmes

Athena GESDA works with international partners and institutions in jurisdictions that may have different labour laws, enforcement standards and business practices.

We expect international Partners involved in our programmes to:

- comply with applicable local law;
- respect fundamental human rights;
- avoid forced or exploitative labour;
- use reputable suppliers;
- provide safe conditions for Delegates and workers;
- treat staff fairly;
- raise material concerns promptly; and
- cooperate with reasonable compliance enquiries.

Where Athena GESDA becomes aware of credible risks, we may:

- request further information;
- require additional assurances;
- revise the delivery model;
- appoint an alternative supplier;
- require corrective action;
- suspend the relationship; or
- terminate the engagement.

17. Reporting Concerns

Employees, contractors, consultants, suppliers, Partners, Clients and other stakeholders are encouraged to report any concern relating to:

- modern slavery;
- human trafficking;
- forced labour;
- child labour;
- worker exploitation;
- withheld wages;
- confiscated identity documents;
- threats or intimidation;
- unsafe living or working conditions;
- deceptive recruitment; or
- retaliation against a person who raised a concern.

Concerns may be reported to:

Email: info@athenagesda.org

The report should include as much information as reasonably possible, such as:

- what happened;
- where and when it occurred;
- who may be involved;
- whether anyone is at immediate risk;
- any supporting evidence; and
- how the person reporting the concern may be contacted, where they are willing to provide details.

Concerns may be raised confidentially.

We will not knowingly tolerate retaliation against a person who reports a genuine concern in good faith.

18. Responding to a Concern

Where a modern slavery concern is raised, Athena GESDA will seek to respond promptly and proportionately.

Depending on the circumstances, we may:

- establish whether anyone is in immediate danger;
- record and assess the concern;
- request further information;
- preserve relevant evidence;
- engage with the supplier or Partner;
- seek professional or legal advice;
- report the matter to an appropriate authority;
- refer potential victims to specialist support;
- require corrective action;
- suspend activities;
- appoint an alternative supplier; or
- terminate the relevant relationship.

The safety and welfare of potential victims will be an important consideration.

We will avoid taking action that could unintentionally place an affected person at greater risk.

19. Remediation

Athena GESDA recognises that immediately terminating a supplier may not always produce the best outcome for affected workers.

Where appropriate, and where individuals are not at immediate risk, we may work with a supplier to implement corrective measures.

These may include:

- repayment of unlawful recruitment fees;
- return of identity documents;
- payment of withheld wages;

- correction of employment terms;
- improved worker grievance mechanisms;
- changes to recruitment practices;
- enhanced monitoring;
- staff training;
- independent review; and
- time-limited corrective action plans.

Serious, deliberate, repeated or unremedied breaches may result in suspension or termination.

Where criminal activity or immediate danger is suspected, the matter may be reported to the relevant authorities without prior engagement with the supplier.

20. Training and Awareness

As Athena GESDA develops, relevant employees, consultants and contractors may receive proportionate information or training covering:

- what modern slavery is;
- indicators of forced labour and trafficking;
- higher-risk sectors and countries;
- responsible procurement;
- supplier due diligence;
- recruitment risks;
- how to report a concern;
- how to respond sensitively;
- the importance of protecting potential victims; and
- the company's contractual and ethical expectations.

Individuals involved in procurement, international operations, recruitment, events and supplier management may require more detailed guidance than those in lower-risk roles.

21. Monitoring Effectiveness

Athena GESDA intends to assess the effectiveness of its approach using proportionate indicators.

These may include:

- the number of material suppliers reviewed;
- the number of higher-risk suppliers identified;
- the number of suppliers accepting relevant contractual clauses;
- the number of concerns raised;
- the number of concerns investigated;
- corrective actions requested and completed;
- modern slavery content incorporated into staff or contractor briefings;
- supplier-policy reviews undertaken;
- relevant personnel receiving training; and
- lessons identified from incidents or concerns.

The absence of reported concerns will not by itself be treated as proof that no modern slavery risk exists.

We will seek to improve visibility and encourage responsible reporting.

22. Continuous Improvement

Athena GESDA recognises that addressing modern slavery is an ongoing process.

We are committed to improving our approach as:

- the company grows;
- new employees or contractors are appointed;
- new countries are entered;
- the supply chain becomes more complex;
- new Services are introduced;
- risks are identified;
- legal requirements develop; and

- good practice evolves.

We will review this statement at least annually and update it sooner where a material change in our operations or risk profile occurs.

23. Approval

This statement has been approved by the leadership of Athena GESDA Ltd.

Name: Andreea Willmott

Position: Founder and Chief Executive Officer

For and on behalf of: Athena GESDA Ltd

Date: 23 July 2026

24. Contact

Questions or concerns relating to this statement may be sent to:

Athena GESDA Ltd

Email: info@athenagesda.org

Website: www.athenagesda.org

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