

# Modern Slavery Statement for the year ending 31st December 2020

This statement is made by Turnitin LLC for the financial year ending on 31st December 2020.

## **Our Organization**

Turnitin LLC (Turnitin) and its associated group companies set the benchmark for online academic integrity and assessment services worldwide. Serving more than 15,000 customers globally, our mission is to ensure the integrity of global education and meaningfully improve learning outcomes.

This statement is written to cover both the operations of Turnitin and its group companies, which as of June 2021 include ExamSoft, UniCheck and ProctorExam. References in this statement to Turnitin are references to the whole group.

We pride ourselves in respecting the individual no matter what gender, race, religion, or orientation. We are committed to doing business in an ethical way, with honesty, integrity and humanity, and we expect the same from our suppliers and their supply chains.

At Turnitin we take our social responsibility extremely seriously. Throughout 2020 we enhanced our existing ethics policies and worked on our Code of Conduct, which was released in February 2021. The Code of Conduct recognizes our commitment to obeying the laws and our ethical standards, in all areas in all countries in which we operate.

## **Our Policies and Training**

In addition to the Code of Conduct, throughout 2020 Turnitin worked on policies and procedures reflecting our zero-tolerance approach to bribery and corruption, in our operations and supply chain. We also strengthened our third-party due diligence practices. In 2021 we are further refining these policies and practices to ensure that third parties we work with act in accordance with our business and ethical standards and to incorporate our zero-tolerance approach to modern slavery and human trafficking. We will take seriously any allegations that human rights are not properly respected by anyone

working with or for us. We expect to have updated these policies and procedures and trained our staff on these important issues and the principles espoused in our Code of Conduct before the end of 2021.

## **Risk assessment & Management**

We have assessed the main areas of risk within our business and supply chain, the results of this assessment are summarized below:

### Personnel

Turnitin has employees based in all regions in the world. The majority of our workforce performs professional, white-collar work and we comply with applicable local legislation and requirements governing our employment and contractual relationships, including laws governing wages and working conditions. Turnitin offers salaries and benefits that meet or exceed regulatory requirements in the relevant jurisdictions. Additionally, our policies and procedures, including those incorporating our strong stance against modern slavery and human trafficking, will apply to all employees globally, and employees will receive appropriate training regarding our ethical standards. As a result, Turnitin believes that the risk of modern slavery occurring within its staff base is very low.

### Supply Chains

Turnitin's software services are almost exclusively generated in-house by its employees and to the extent that we have a 'supply chain' it is minimal as very few materials or services are procured. The small number of suppliers that we do have provide only software services, are primarily based in Europe and North America, and do not present a meaningful modern slavery risk. However, as part of refinement of our third-party diligence process we intend to conduct a risk assessment to identify whether there are undiscovered direct or indirect risks in our supply chain.

## **Our approach**

As noted above, our Code of Conduct was put in place in February 2021, and we believe this will help reduce the risk of modern slavery in our business and supply chain. Training on the Code of Conduct and related issues will be provided in 2021.

## **Key Performance Indicators**

Turnitin is developing ways to assess the effectiveness of the steps it has taken to combat modern slavery. These are likely to include a review of existing suppliers to determine those which present the greatest risk of modern slavery whether because of the jurisdiction in which they are based or the services that they provide.

### **Approval**

This statement has been approved by the Turnitin Board of Directors, as of June 8, 2021. This statement and Turnitin's approach to Modern Slavery issues and laws will be reviewed annually.

A handwritten signature in black ink that reads "Chris Caren". The signature is written in a cursive, slightly slanted style.

*Chris Caren, Chief Executive Officer  
The Board of Directors*