



UK Modern Slavery and Human Trafficking Statement

This statement is made by 2U Group (UK) Limited, 2U GetSmarter (UK) Limited, GetSmarter Online Limited and Trilogy Education Services UK Limited (collectively, the “2U UK Entities” and each a “2U UK Entity”) in accordance with its obligations under s. 54 Modern Slavery Act 2015 (the “Modern Slavery Act”) for the fiscal year ending December 31, 2020.

For the purposes of this statement, any reference to “2U” or “we” is a reference to 2U and all its subsidiaries (including the 2U UK Entities), as we uphold the values set out in this statement, regardless of geographic location. We are committed to upholding the highest ethical standards, and complying with relevant laws and regulations, including ensuring the prevention of modern slavery in our supply chain.

Company Structure and Business Overview

2U is headquartered in the United States in Lanham, MD, and has a presence in a number of other markets around the world. We employ over 6,000 full-time and part-time employees across several jurisdictions. Each 2U UK Entity is a direct or indirect subsidiary of 2U.

2U is a leading digital transformation partner for nonprofit colleges and universities. We build, deliver, and support more than 500 digital and in-person educational offerings, including graduate degrees, undergraduate degrees, professional certificates, boot camps, and short courses. Together with our university clients, we have positively transformed the lives of more than 300,000 students. Our comprehensive platform of tightly integrated technology and services provides the digital infrastructure that universities rely on to attract, enroll, educate and support students at scale throughout their lives.

Modern Slavery Risks

Based on the nature of our business, workforce, and the services we provide, we consider the risk of modern slavery in our business to be minimal. If a risk of modern slavery, or a potential modern slavery incident, was identified in our business or supply chain, we would investigate that risk or incident in accordance with our Code (as described below).

2U’s Policies and Training

2U maintains a “Code of Business Conduct and Ethics” (the “Code”, a copy of which can be found on our investor relations website at <http://investor.2u.com>) that applies to all subsidiaries and

prohibits, among other things, our directors, officers, employees and independent contractors from engaging in any unlawful activity in conducting 2U's business or in performing their day-to-day duties. The Code also requires directors, officers, employees, and independent contractors to engage with our partners, suppliers, competitors, and employees fairly and ethically in all business dealings on 2U's behalf. This includes acting in compliance with the Modern Slavery Act. All 2U employees receive annual training on the Code and are required to certify that they have received and reviewed a copy of the Code. If an employee becomes aware of an actual or imminent breach of the Code, they are obliged to escalate the issue to a manager, the Compliance Officer or anonymously to our ethics hotline. We have a strict policy prohibiting retaliation against anyone who raises potential violations. With respect to the conduct of our suppliers, our contracts generally require our suppliers to comply with applicable laws, including the Modern Slavery Act. Should 2U become aware of any policy violations or issues related to slavery or human trafficking, we will consult with our legal team to ensure that appropriate measures are taken, which may include reporting this information to authorities and terminating our relationship with a supplier.

In addition to requiring compliance with law under the Code, our Employee Handbook also requires compliance with all 2U policies and indicates that we are committed to a work environment in which individuals are treated with respect, that we prohibit discriminatory practices and that we are committed to providing a safe and healthy workplace for all employees. New employees are provided the Employee Handbook upon hire and a copy is available on the employee intranet.

Tackling Modern slavery and human trafficking is a complex challenge. 2U continues its efforts to combat these practices and develop policies and procedures accordingly.

This statement was approved by the Board of Directors of each 2U UK Entity on 25 May 2021.



[Paul Lalljie \(May 26, 2021 10:16 EDT\)](#)

Paul S. Lalljie
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