

Modern Slavery Statement

1. Introduction

Modern slavery is an umbrella term covering forced labour, debt bondage, forced marriage and human trafficking. It refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception or abuse of power.

This statement sets out Grok Global Services' approach and commitment to addressing modern slavery, human trafficking, forced labour and labour rights violations in our operations and supply chain.

2. Our Business and Supply Chain

Grok Global Services is a US corporation headquartered at 535 Dean Street, Suite 916, Brooklyn, New York 11217, USA. We operate through subsidiaries in a number of markets and engage staff in additional markets through Employer of Record and Professional Employer Organisation arrangements.

We work exclusively in international education. Our services are In-Country Staffing, through which we deploy dedicated in-market staff supporting our client institutions, and Digital Marketing. We do not accept commissions and do not sell services to students.

Our supply chain includes facilities and office services, technology and software, travel, and event and marketing services. Procurement is carried out both centrally and within local markets.

3. Policies

Our Modern Slavery Policy sets out our position, what is expected of employees, how risk is assessed, and how concerns are raised and handled. It applies to employees, officers and directors of Grok Global Services and its subsidiaries, and to individuals engaged through Employer of Record and Professional Employer Organisation arrangements. It also sets out the standards we expect of contractors, freelancers, suppliers and vendors.

This is supported by our Anti-Corruption and Anti-Bribery Policy, our Anti-Money Laundering and Sanctions Compliance Policy, and our corporate code of conduct.

4. Risk

We recognise that modern slavery exists in the regions where we operate, and that commitment alone does not prevent it. Risk is not evenly distributed across our operations. It is lowest where we employ people directly and increases with each additional layer between Grok and the individual performing work, whether that layer is an Employer of Record or Professional Employer Organisation arrangement, a supplier, or a subcontractor engaged by that supplier.

Recruitment fees are never charged to workers, and our partners are expected to confirm the same.

Separately, our in-market teams operate in person and may encounter students and others in vulnerable circumstances. Our employees are trained to recognise the indicators of modern slavery and to raise concerns through the channel below.

5. Due Diligence

When engaging suppliers, vendors and partners we ask who will perform the work and whether it will be subcontracted. We expect suppliers to comply with applicable labour law, to refrain from any form of forced labour, debt bondage or human trafficking, to refrain from charging recruitment fees to workers, and to disclose subcontracting arrangements on request. We reserve the right to make enquiries regarding labour practices and to terminate a relationship where modern slavery is identified and not adequately addressed.

We maintain a centralised register of our Employer of Record and Professional Employer Organisation partners, supporting oversight of these relationships across our markets.

6. Training and Reporting

All employees complete modern slavery awareness training, reviewed periodically and updated to reflect changes in our operations or the external environment.

Grok maintains a single point of contact for concerns related to modern slavery: modernslavery@grokglobal.com. Concerns may be raised in good faith without fear of retaliation, and an alternative reporting route is available.

7. Effectiveness

We assess the effectiveness of our approach through completion of modern slavery awareness training, periodic review of this statement and the underlying policy, and review of concerns raised through our reporting channel.

As at the date of this statement, Grok has not received reports of, or identified, violations of human rights or cases of modern slavery within the organisation or its supply chain.

8. Approval

This statement was approved on behalf of Grok Global Services.



Alex Green
Chief Executive Officer
Grok Global Services

Last updated August 2026