

Modern Slavery Statement

Our commitment against modern slavery, human trafficking, forced labor, and child labor in our operations and our supply chain, and how to report a concern.

Effective April 30, 2026 · Next scheduled review April 30, 2027

Fractional Coordinator, Inc. is incorporated in Delaware and headquartered in Oregon. We publish this statement voluntarily, in the spirit of the UK Modern Slavery Act 2015 (Section 54) and the California Transparency in Supply Chains Act, although we are not currently subject to either statute by threshold.

Why we publish this

Modern slavery, human trafficking, forced labor, and child labor are among the most serious human rights violations. Fractional Coordinator is a small civil rights compliance firm operating primarily in the United States and is not a reporting entity under the UK or California statutes. We publish a clear statement anyway, because our work centers on protecting people from institutional harm and our own operations should hold up to the same standard.

Our business

Fractional Coordinator provides investigations, fractional leadership, audits and policy infrastructure, OCR matter support, and training and certification to colleges, universities, PK-12 districts, and workplaces. Our principal place of business is in the United States. Our personnel are employees and a small number of independent contractors, all based in the United States. We do not manufacture goods, operate physical supply chains, or hold inventory.

Our commitments

- We do not engage in or tolerate modern slavery, human trafficking, forced or compulsory labor, or child labor in any part of our operations.
- We do not knowingly engage with suppliers, vendors, contractors, or business partners who do.
- We pay our personnel at or above living-wage standards for their roles and locations, treat overtime fairly, and do not require any form of bonded or coerced labor.
- Our personnel hold their own identification documents. We do not retain anyone's passport or other identity documents as a condition of work.
- Our personnel are free to leave their role with reasonable notice. We do not enforce non-compete or contractual provisions designed to coerce continued employment.

Our supply chain

Our supply chain is short. Our material vendor relationships are with cloud hosting providers, a payment processor, a small number of software-as-a-service tools (email delivery, document signature, video conferencing, and accounting), professional services (legal counsel, accounting, and insurance), and venue and travel services for in-person training programs.

We expect each vendor to maintain practices consistent with this statement. Where a vendor publishes its own modern slavery or human rights statement, we review it as part of vendor due diligence. Where a vendor does not publish one but operates in a jurisdiction with strong labor protections, we proceed. Where a vendor operates in a higher-risk jurisdiction or sector, we ask additional questions before proceeding.

Risk assessment

We assess our exposure as low, given the nature of our business and the geography of our operations. The specific areas we monitor are these.

- **Hospitality and travel vendors.** Hotels, transportation services, and food vendors used for in-person training programs operate in industries with documented exposure to labor exploitation. We prefer vendors with published anti-trafficking policies and certifications where they are available.
- **Apparel and merchandise.** When we commission branded merchandise, which is rare, we source it through suppliers with verifiable supply chain transparency.
- **Cleaning and facilities services.** Where we operate physical office space, cleaning and facilities services are sourced from vendors that pay living wages and treat workers fairly.

Training and awareness

Modern slavery awareness is part of our annual personnel training. Practitioners are equipped to recognize potential indicators of trafficking and exploitation in the course of their compliance work, particularly in PK-12 and ADA matters where vulnerable individuals may be at higher risk. A practitioner who suspects trafficking in the course of an engagement escalates immediately to senior leadership and, where appropriate, to the institution's reporting structure and to law enforcement.

Reporting a concern

If you become aware of conduct by our personnel, by one of our vendors, or in the course of one of our engagements that you believe involves modern slavery, human trafficking, forced labor, or child labor, report it to our leadership at ethics@fractionalcoordinator.com. Reports may be made anonymously. We do not retaliate against good-faith reports.

For a concern involving immediate danger or active exploitation, contact local law enforcement or the National Human Trafficking Hotline at **1-888-373-7888**, or text "HELP" to 233733.

Approval and review

This statement is approved by the senior leadership of Fractional Coordinator, Inc. It is reviewed annually and updated as our operations change or as practice evolves.

How to reach us

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