



# **Modern Slavery and Human Trafficking**



## 1. Introduction

Accelerate aspires to be recognised as a trustworthy, open, honest, and ethical organisation. Therefore, we are committed to supporting an ethical approach to procurement and environmental sustainability in the supply chain. We understand our legal requirements and obligations around our conduct regarding the protection of human and labour rights, including combatting modern slavery in our supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## 2. Scope

This policy applies to all Accelerate directors, employees, officers, as well as contractors under Accelerate's direct supervision. Accelerate will continue to commit to the continual improvement of all our supplier procedures and to the review and due diligence of our supplier base each financial year. This review includes Supplier Assessment, Risk Assessment, and Supplier Diligence Questionnaires.

In addition, Accelerate has deployed the following related policies:

- Anti-Bribery and Corruption Policy
- Equal Opportunities Policy
- Health and Safety Policy
- Whistleblowing Policy

## 3. Approach

This policy sets out the steps Accelerate has taken and will continue to take to ensure slavery and human trafficking does not take place in any part of its business. Accelerate has a zero-tolerance approach to slavery and human trafficking and this policy has been produced pursuant to Section 54 of the Modern Slavery Act 2015. Accelerate expects its suppliers and their supply chains to adopt all reasonable and practical steps to comply with the Modern Slavery Act 2015. This policy does not form part of any employee's contract of employment so may be amended from time to time.



## 4. Responsibility for this policy

Accelerate directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations. The SLT has day to day responsibility for implementing this policy and monitoring its effectiveness in the prevention of slavery and human trafficking.

All employees, consultants, workers, and contractors are encouraged to report any concerns they have about slavery and/or human trafficking affecting the business, even if they turn out to be mistaken.

## 5. Steps for the prevention of Modern Slavery

Accelerate uses the following key performance indicators to measure how effective our policies are in ensuring slavery and human trafficking is not taking place in any part of our business:

- Use of suppliers who themselves have in place ethical codes of conduct and often these are of a contractual nature.
- Carrying out due diligence where appropriate on suppliers.
- We regularly review our policies, codes of conduct and our working practices to show commitment.
- We regularly consider the level of risk of slavery and human trafficking pose to Accelerate, its suppliers, contractors, and business partners and given the nature of the companies in our supply chain, we consider this risk is very low.
- All suppliers, contractors and other business partners will also be made aware of Accelerate's zero tolerance approach to modern slavery and will be expected to adopt the same approach.
- Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains or any supplier tier at the earliest possible stage.

## 6. Policy Review Process

Accelerate is committed to continually review and improve all of our policies, and may make changes at any point. At the very least, all policies are reviewed annually and will be issued to all Accelerate directors, employees, officers, as well as contractors under Accelerate's direct supervision ("Colleagues").



## **7. Enforcement & Consequences**

Non-conformance or breach by any colleague or third-party will be subject to investigation and may lead to disciplinary actions, up to and including termination of employment/contract.



## Version Control

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