

As an organisation that helps our customers create a safer, more sustainable world, Alcumus is continuously taking steps to combat modern slavery and human trafficking and is committed to meeting our obligations under the Modern Slavery Act 2015. This statement applies to all companies listed under the section 'Our Business'. We take a zero-tolerance approach to non-ethical practices and are committed to acting professionally, fairly, and with integrity in all our business dealings and supply chain relationships, wherever we operate. We are committed to implementing and enforcing effective systems to uphold ethical standards which combat modern slavery and human trafficking.

Our Structure

We provide risk management and compliance services for a wide range of industry sectors and are predominantly UK focused, with operations in North America. We operate throughout the UK with our head office in Cardiff. We also have offices in North America and Lebanon ensuring that our teams comply with relevant legislation and monitor their supply chains accordingly.

Our Business

Our business provides a number of products and services to a breadth of customers, ranging from sole traders to multinational companies. Our associated legal entities providing services to our customers include:

Alcumus Holdings Limited

Alcumus SafeContractor Limited

Alcumus SafeWorkforce Limited

Alcumus SafeHR Limited

Alcumus ISOQAR Limited

Planet First Limited

Alcumus SafeContractor Inc. (Canadian registered company)

Cognibox Inc. (Canadian registered company)

Alcumus offers a solution for clients to manage and mitigate any risk of modern slavery in their supply chain, through our supply chain compliance solutions. You can read more about this in our [Modern Slavery whitepaper](#).

Our Supply Chain

We have a primarily UK-based supply chain which includes a small number of suppliers from North America. It includes larger technology providers as well as third-party associates and consultants, SMEs, and local businesses that have the requisite technical skills and qualifications to help us deliver our services. One of our legal entities also operates a partner network that is predominantly based in India, South Africa, Serbia, and Turkey. As part of our contracting process, we require the majority of suppliers to adhere to our code of conduct detailing our modern slavery commitments and values to uphold. Where contracting on our standard supplier terms, we expressly require strict compliance with modern slavery legislation. We are further implementing modern slavery into our supplier on-boarding process to ensure every new and current supplier has adequate statements in place to reflect the modern slavery standards we hold. Our annual review of our suppliers allows us to ensure continued compliance against these standards. Suppliers with a high controlled risk rating are subject to further audit requirements on a regular basis. The consequence of non-compliance is clear and actioned which may result in us not entering into, or terminating, relationships with suppliers.

Our employees receive modern slavery training during their induction to ensure each and every employee has adequate knowledge, and is able to identify the risks of modern slavery in the supply chain.

Our Policies

We are committed to ensuring that there is no modern slavery, human trafficking, child or forced labour in our supply chains or in any part of our business. As part of this commitment, in addition to this statement, we have the following policies within Alcumus:

- Whistleblowing Policy;
- Code of Conduct Policy; and
- Anti-Bribery and Corruption Policy.
- Control of Suppliers Policy

These policies reflect our commitment to acting ethically and with integrity in all our business relationships. We implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains. As part of our internal sustainability programme, we are working to improve and strengthen our policies further and work closely with our suppliers to ensure that they are aware of and compliant with these.

In 2021, we established a partnership with the UK-based anti-slavery charity, Unseen. This collaboration has helped increase awareness of the importance of business accreditation and technology to demonstrate compliance to regulations, which actively supports the charity's ongoing vision of working towards a world without modern slavery. You can read more about our partnership on our website and [here](#).

Due Diligence and Training

We have procedures in place to establish, assess, and monitor areas of the potential risk of slavery and human trafficking occurring in our businesses and supply chains. We actively promote the importance of raising any concerns to staff and provide adequate protection for whistle-blowers. We have appropriate measures in place to mitigate the risk of modern slavery practices occurring within our business e.g. checking the authenticity of right to work documents.

To ensure a greater understanding of the risks of modern slavery and human trafficking in our business and supply chains, we currently have in place processes to educate our employees to recognise the risks of modern slavery in our business and supply chains. Modern slavery forms part of our induction to all new employees and specifies the content we have available for additional training.


Current Activity

We have achieved Planet Mark certification which means we have a greater understanding of supplier maturity, and specifically, deeper cognisance of the practices and supply chains of our most utilised suppliers.

We are in the midst of a full merger with Veriforce and are currently in the process of assessing each groups' compliance practices which includes modern slavery. Our intention is to integrate the compliance teams and delegate responsibility for driving modern slavery innovation within the group of companies. We hope to have a better picture of the structure or form this will take for our next statement.

Concluding Remarks

This statement has been approved by the Dragon UK Holdco Limited Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Alcumus' slavery and human trafficking statement for the current financial year in which it is written.

A handwritten signature in black ink, appearing to read "Tim Jackson". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Tim Jackson

Chief Financial Officer, Alcumus

May 2025