AKKADIAN

Modern Slavery Policy - Statement

Department: Governance and Legal

Author: Steve Tidmarsh

Date: 2022/11/07

Current Version: 1.1

Version	Date	Action	Author
1.1	2024.01.15	Review and Update	Steve Tidmarsh

Table Of Contents

Introduction

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by **Akkadian Ltd** for the period **2024/2025** to prevent modern slavery and human trafficking in its own business operations and supply chains.

We unequivocally declare our commitment to eradicating modern slavery from our operations and supply chains. As a responsible corporate entity, we recognize the profound impact that slavery, in all its insidious forms, has on basic human rights - a stark contradiction to the principles enshrined in the Universal Declaration of Human Rights.

This statement applies specifically to **Akkadian Ltd,** emphasising our dedication to upholding the dignity and rights of all individuals. The Universal Declaration of Human Rights, particularly Articles 1 and 4, serve as our guiding light in this pursuit:

"All human beings are born free and equal in dignity and rights."

"No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms."

Our commitment to addressing modern slavery extends beyond rhetoric. Akkadian Ltd adheres to the rigorous standards outlined in sections 54 and 45 of the Modern Slavery Act. Our strategic approach is encapsulated in the four Ps of modern slavery:

Prepare, **Pursue**, **Prevent**, and **Protect**.

As we embark on this journey to combat modern slavery, our comprehensive strategy reflects our unwavering dedication to compliance, transparency, and the promotion of ethical business practices. Join us as we take a strategic perspective in addressing this critical issue, influenced by legal obligations, human rights principles, and a steadfast commitment to creating a world free from the shackles of modern slavery.

Business and Operational Structure:

Akkadian Ltd is a private limited company that specialises in providing risk management, medical, and training services. Our core operations are centred on delivering high-quality risk management, medical, and training solutions to implementation partners (IPs), NGOs, government organisations, and media companies.

- Operations in 5 Countries
- Employing 30 Expatriate Contractors
- Employing 10 Local staff
- Serving 20 Customers

Customers:

Akkadian is committed to demonstrating its ethical and social responsibility credentials so that customers can make informed choices about whose services they purchase.

Suppliers:

Akkadian is committed to monitoring social standards in our supply chain, and we encourage our suppliers to operate with the same ethical standards we employ ourselves.

Akkadian Code of Practice:

This code of practice applies to:

- Staff directly employed by the Akkadian on temporary or permanent contracts.
- Staff employed or provided by contractors or employment agencies to work on Akkadian premises or to undertake work on behalf of Akkadian.
- No forced, bonded or involuntary labour shall be used.
- All employment with Akkadian is freely chosen.
- Staff are not required to lodge deposits or identity papers with us
- Staff are free to leave Akkadian after serving reasonable notice as set out in their contract of employment.

Child Labour:

- Akkadian is against the use of child labour and believes its long-term elimination is ultimately in the best interests of children. However, the elimination of child labour must always be undertaken in a manner consistent with the best interests of the children concerned. Procurement and supply management professionals will ensure that their organisation's supplier comply with the following: in this context, "child" refers to any persons less than 15 years of age, unless local legislation on the minimum age stipulates a higher age for work or mandatory schooling in which case the higher age shall apply.

- Young person refers to any worker over the age of a child, as defined above, under the age of 18.
- Akkadian will not employ children or young persons under the age of 18.

Working conditions:

- A senior member of staff is assigned responsibility for Health and Safety within the Company.
- The Company takes adequate measures to prevent accidents and minimise potential hazards.
- Employees receive regular health and safety training and have access to the Health and Safety Policy.
- The nominated management representative regularly monitors compliance with the Health and Safety Policy.
- Appropriate PPE is provided to all employees who require them at no cost to the individual.
- Employees have unrestricted access to welfare, toilet facilities and drinking water and are entitled to regular breaks.
- Akkadian has a published Health & Safety Policy.

Working Hours and remuneration

- Employee pay rates are above the national legal minimum standards
- Employees are not forced to work in excess of 48 hours per week
- Employees are provided 2 days off per week
- Employees are given written terms and conditions of employment that details the employment relationship between and the respective obligations of the employee and the employer, rates of pay, working hours, grievance and disciplinary procedures, holiday entitlement, absence and sick pay rules and notice periods for termination of employment.
- No deductions are made from wages as a disciplinary measure, and pay slips detailing lawful deductions are provided for each pay period.
- Labour only, contracting, sub-contracting and fixed-term contracts are not used as a means to avoid obligations under labour or social security laws.

Discrimination:

- There is no discrimination in pay, hiring, compensation, access to training, promotion and termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation.
- Opportunities for personal and career development are equally available to all employees.
- No harassment, threats, abuse or intimidation shall be practised. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and grounds for summary dismissal, if proven.

Employment Agencies:

Employment agencies contracted to supply temporary staff shall demonstrate commitment to and application of the requirements of this code. Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to the Akkadian are eligible to work in the UK and as an overseas employee by:

- Following Immigration and Nationality Directorate Guidelines on Amendments to Section 8 of the Asylum and Immigration Act 1996
- Ensuring that the requirements of the Immigration and Asylum Act 1999 Section 22 Code of Practice are met.
- Retaining copies of identity papers, work permits or passport stamps as detailed in the Home Office List of Specified Documents and UK Passport Stamps.

Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to Akkadian have sufficient command of English to understand:

• The agency's responsibilities under this code of practice

• Akkadian's health and safety requirements

• Written statements of employment particulars

• Other measures should be put in place to ensure that all these requirements are communicated in the employee's native language.

The Akkadian Directors have overall responsibility for the Modern Slavery policy for Akkadian Ltd within the business.

Steve Tidmarsh

Chief Operating Officer
Akkadian Ltd

2024/01/15