

MODERN SLAVERY STATEMENT 2026

The Modern Slavery Act 2015 (the Act) requires organisations supplying goods or services with a turnover of more than £36 million to prepare and publish an annual Modern Slavery Statement.

Our Commitment

Acis Group Limited ('Acis') is committed to preventing slavery and human trafficking in all its business activities and with supply chains. This statement outlines the steps we have taken to ensure compliance with the Act and to minimise the risks of any association with practices which undermine the principles of safety and dignity for all our customers and at work, particularly for people from vulnerable groups. This statement covers our current position on modern slavery and activities undertaken during the financial year 2025/26.

Where Acis identifies a person who may be a victim of slavery or human trafficking, it will follow the applicable safeguarding and referral procedures. An adult may be referred into the National Referral Mechanism only with their informed consent. Where an adult does not consent, Acis will seek advice from, or refer the matter to, an appropriate first responder or specified public authority so that any applicable Duty to Notify requirements can be met.

The Acis way

Acis believes that customers come first. We aim to deliver great services to all our customers, both internal and external, in line with our vision to "be there when our customers need us". Our values, and our processes aim to prevent slavery and human trafficking within our business activities and external supply chains.

Our structure, business and supply chains

Acis is a company limited by guarantee, a registered charity and a registered provider of social and affordable housing. Acis is also the parent company in a group structure. The active subsidiary companies provide various education and skills services.

We are committed to responsibly managing our supply chains, treating our customers and suppliers fairly and with respect, and allying ethical procurement with value for money.

We will take steps to satisfy ourselves that our supply chains are satisfactory in terms of the requirements of the Act, as well as meeting any formal requirements we set out for our suppliers.

Responsibility for compliance with the Act rests at the highest level, with our Board and Executive Leadership Team. Responsibility for preparing the statement has been assigned to the Governance and Data Protection Manager.

Our first tier supply chain consists mainly of works and services rather than goods, with one of the highest risk areas being associated with our building and maintenance activities.

We may come across slavery and/or human trafficking in connection with the vulnerable people that we support, in particular those from a minority or socially excluded group, who may be subject to forced labour and/or domestic servitude, and potentially in connection with

our workforce. Accommodation managed by Acis could also be a potential venue for modern slavery.

Our Slavery and Human Trafficking Policies, together with other relevant policies

The Act requires organisations to take steps to address modern slavery and human trafficking in their businesses and supply chains. As Acis and its subsidiaries together has a turnover of over £36m, we are publishing this statement setting out what we have done to recognise and prevent potential instances of modern slavery.

The most vulnerable groups in the UK include migrant workers, illegal migrants, asylum seekers and individuals, such as homeless people and people with learning difficulties. We are working on identifying how modern slavery and human trafficking may affect customers, our business and supply chains. This involves educating colleagues about the potential risks and capturing best practice in policies and procedures for example, within colleagues mandatory training and induction.

We are confident that our policies, procedures, strategies and working documents (“documents”) promote good behaviour among our people at work and within our supply chain. These documents are kept under review to ensure that they reflect Acis’ evolution and our regulatory and statutory obligations. Acis has a range of documents in place that contribute to ensuring modern slavery does not occur within our business or supply chain, including:

- Employee Code of Conduct
- Dignity at Work Policy
- Equality, Diversity & Inclusion Strategy
- Anti-Fraud & Bribery Policy
- Health & Safety Policies
- Recruitment and Selection Policy
- People Services suite of policies
- Whistleblowing Policy
- Domestic Abuse and Group Safeguarding Policies
- Financial Regulations/Standing Orders

Keeping Children Safe in Education is a statutory guidance for schools and colleagues. As Acis provides services for education and skills, a check and challenge approach has been adopted for colleagues who are involved with safeguarding children, and an annual confirmation that these colleagues have read and understood the guidance is submitted.

Acis operates safer recruitment processes that require all potential new employees to be vetted prior to employment commencing; this allows Acis to confirm qualifications and eligibility to work in the UK.

Where there is a need to source agency staff Acis uses an approved supplier list in accordance with our internal procurement policies and procedures. These providers have undergone due diligence to ensure their practices comply with the legislation and decrease the risks to Acis.

In addition to this, Acis requires relevant high-risk suppliers to have policies, procedures and training in place to know how to raise and report incidents of suspected modern slavery and/or human trafficking. Where a relevant supplier does not have some or all of these documents then that supplier will be required to adopt Acis’ approach. Specifically, suppliers are also able to whistle blow using Acis’ own policy if they do not have their own such policy in place.

Our Procurement

Our Procurement Strategy is designed to ensure we operate in a legal, ethical and inclusive manner whilst achieving best value for money. This includes enabling our procurement activity to generate social and environmental, as well as commercial, benefits.

As there is a greater potential risk of modern slavery and/or human trafficking within the construction part of Acis' supply chain we have looked at the two main consortia that Acis procures through. Both consortia have built in criteria that a contractor must satisfy to be considered for the frameworks.

The procurement process documentation has been amended to incorporate specific due diligence e.g. Procurement Selection Questionnaire (PSQ), standard documents, pre-procurement checks, and a risk register. The Procurement Strategy 2023-27 has actions regarding Supplier Management and there is an action for 100% peer auditing of high-risk suppliers. These are ongoing actions to be taken and monitored.

Our due diligence processes in relation to slavery and human trafficking in our business and supply chains

We have taken time to understand the implications of the Act and to identify the areas within our business and supply chain where the greatest risks exist. These are:

- Procurement
- Supporting vulnerable clients living within our homes.

We have undertaken risk assessments in respect of these key areas and put measures in place to mitigate them. Every supplier has a named Supplier Manager who is responsible for that supplier and their adherence with Acis' requirements.

Our risk identification, assessment, management and/or mitigation

Whilst a wider range of performance indicators are being implemented, the main method of monitoring effectiveness within the supply chain is included in the Selection Qualification criteria for suppliers, which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain.

Acis has established safeguarding (which includes Modern Slavery) policies and procedures with its partner agencies to safeguard the welfare of children and vulnerable adults and protect them from harm.

Our training

Currently we have a protecting vulnerable adults and children programme of training that employees must complete to enable them to know how to report incidents of abuse and neglect.

In addition to this we have provided an e-learning module which covers modern slavery and human trafficking to our people and make that learning mandatory training. All of our people are required to undergo the training on an annual basis to help them identify what human trafficking and slavery is, how to identify when this is happening and what to do. The module was refreshed in 2025, and ongoing monitoring by both the Safeguarding group and People Services continues to ensure training is completed.

Also, Acis' Procurement Manager completes, on an annual basis, the Chartered Institute Procurement and Supply Ethical Procurement and Supply e-learning course.

DECLARATION

This statement has been approved by the Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Peter Noble
Chair of Acis Group Limited
September 2026