

**Modern Slavery and
Human Trafficking Statement
2024**

Modern Slavery and Human Trafficking Statement

This statement sets out Academia Groups actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Academia Group, including its associated and subsidiary companies, recognises that it has a responsibility under the Modern Slavery Act 2015 to take a robust approach to slavery and human trafficking and we are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Organisations Structure and Supply Chains

We are a UK based provider of technology services for education, public services and the private sector, providing IT solutions and services UK wide. Headquartered in Hertfordshire with our supply chains based within the UK.

Due to the nature of our services, our business operations are predominantly in the technical arena. We provide services to a range of public sector organisations and education such as Schools and Colleges, Universities, NHS as well as to the private sector.

HR Policy – We promote our Modern Slavery Policy within our people Team HUB which is available to all colleagues and is provided upon commencement of employment. We have zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally, and are paid above the national minimum wage. Our employees won't be forced to work in excess of the number of hours permitted in law, and normal working hours won't exceed 48 hours per week average unless the employee agrees.

Purchasing Policy – The company is committed to conducting purchasing activities in a fair, objective and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to our 'Code of Ethics', 'Anti-Bribery' and 'Modern Slavery and Human Trafficking' policies which fulfil legal and financial obligations and effectively manage commercial risk. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable environmental, sustainable, business integrity along with Corporate Social Responsible (CSR) standards including but not limited to compliance with laws and regulations, respect for human rights, working conditions, equal opportunities, maintenance and promotion of information security, fair trade and acceptable corporate ethics.

Recruitment Policy – We use specified and reputable employment agencies to source workers, we verify the practices of all agencies prior to commencing any working relationship. We also ensure that all employees have the right to work in the UK.

Whistleblowing Policy – We encourage all of our employees and business partners to report any concerns related to direct activities or the supply chain of Academia Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

Our Values – Academia’s values of Trust, Integrity and Customer make it clear to our employees the actions and behaviours expected of them when representing Academia Group. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

Due Diligence

We undertake due diligence in relation to slavery and human trafficking when considering taking on new suppliers, and review our existing suppliers on a periodic basis. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- When a supplier is deemed to be higher risk by country of origin and/or lack of suitable policy/processes, an investigation is raised and assessed by senior members of the purchasing team which can result in the vendor being inactivated.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Addressing the Risks

Due to the nature of the supply chain, Modern Slavery risks are inherently higher in the hardware and peripheral item category, as the production process relies on factory labour.

Additional steps to manage the risk include sourcing goods from recognisable brands and reputable resellers, with evidenced processes and policies in place along with products/suppliers that are assessed based on the country of origin. Countries and regions are assessed for risk based on the Global Slavery Index, taking into consideration the latest updates from The Department for International Trade.

Raising Awareness

The organisation has raised awareness of modern slavery issues by circulating information to employees. The information explained to relevant employees:

- The principles of the Modern Slavery Act 2015 and how it applies to Academia;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

We are currently improving our colleague mandatory training and planning to strengthen knowledge through these activities.