

## **Modern Slavery Act 2015: Modern Slavery and Human Trafficking Statement**

We provide business and IT consulting services to implement and manage Oracle cloud applications. Our mission is to continue to be recognized as a premier consulting firm delivering high-value solutions. We will accomplish this by:

- Building strong, long term trusted partnerships with our clients;
- Investing heavily in developing industry specific solutions;
- Employing and nurturing the best consultants to meet our clients' needs; and
- Being the best organization to work for and having the best people to work with

We are committed to achieving this whilst also meeting our high legal and ethical standards. Our commitment to ensuring that slavery and human trafficking is not part of our supply chain is essential to safeguarding our consultants, clients, and organization.

The following statement is made by Accelalpha Inc, Accelalpha Europe Limited and Frontera Consulting UK Limited in accordance with s.54(1) of the Modern Slavery Act 2015. This statement relates to actions and activities during the financial year from 1<sup>st</sup> January 2023 to 31<sup>st</sup> December 2023.

### **Risk Assessment**

As a professional services firm, we consider that we are at a low risk of modern slavery occurring within our own business operations. Our risk assessment however suggests that there is a greater risk within our supply chain, and therefore we are taking further steps to manage those risks, depending on the risk factors involved with that supply arrangement.

### **Our Policy**

All employees are expected to work to the Code of Conduct adopted by our business in all our regions that we operate in, and all our companies must comply with local legislation and regulations. We do not tolerate slavery or human trafficking in our organization, or by our employees or contractors. We expect all employees in our organization to act with integrity and comply at all times with laws, regulations and rules that apply to us. If instances arise where these expectations are not met, we will act and respond in an appropriate manner.

We have measures in place that seek to mitigate the risk of slavery and human trafficking in relation to our employees and contract workers, including the following:

- We adhere to applicable labour and employment laws, regulations and rules in regions where we operate.
- We make our employment decisions in a non-discriminatory manner.
- We are committed to maintaining a workplace free from harassment, discrimination, violence, retaliation and other disrespectful and inappropriate behaviour. Employees are expected to create and maintain a safe, respectful and professional workplace.
- Our businesses are expected to abide by all non-discrimination or human rights legislation in the various jurisdictions where we operate. These laws generally prohibit discrimination on various grounds such as race, colour, religion/creed, age, gender, gender identity/expression, marital status, sexual orientation and disability.

- Suspected violations with respect to human rights are reported to Human Resources, which takes appropriate action to review and address the issue. Human Resources reports any human rights policy violations to our management team.
- All our employees have a shared responsibility for doing the right thing. We have employee misconduct and complaint policies and procedures, through which employees and external stakeholders can escalate concerns without fear of reprisals.

We have recently implemented our Accelalpha Listens Form, which serves as a dedicated and confidential channel for our employees and contractors to raise concerns about potential misconduct, ethical violations, harassment violations, or any behavior that is inconsistent with our values.

## **Sourcing and Supply Chain**

It is important that all vendors and suppliers conduct business in compliance with local laws, regulations and industry standards.

Furthermore, over the next 12 months we are taking steps to implement the following safeguards;

- Creating a supplier code of conduct and requiring all our suppliers to agree to be considered a supplier;
- A pre-supplier checklist and screening process to further assess the risk of any slavery or human trafficking within our supply chain; and
- Seeking to include contractual clauses for suppliers where possible to do so.

Through these safeguards we will require vendors and suppliers to;

- Not employ any person under the age of 15 (or 14 where local law allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15. Take reasonable steps to ensure that workers under 18 years of age should not perform work that is likely to jeopardize the health or safety of young persons;
- adhere to legitimate workplace apprenticeship programs and comply with all laws and regulations governing child labor and apprenticeship programs;
- not use any forced or involuntary labor, whether prison, bonded, indentured or otherwise;
- not require employees to relinquish any personal identification, including but not limited to passports, identification cards or work permits, as a condition of employment;
- treat each employee with dignity and respect, and will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse;
- allow freedom of association when allowed by local law, and in all cases respect the right of employees to communicate openly and directly with management and will not intimidate, harass or reprimand employees for doing so;
- comply with all wage and hour laws as mandated by applicable country law or industry standard, including those relating to minimum wages, overtime, maximum hours, and other elements of compensation;
- not routinely work more than sixty hours per week and employees should be provided with a minimum of one rest day in every seven-day week;
- contribute to all statutory social security and welfare funds to which employers and/or employees are required by applicable laws to contribute, including medical insurance, industrial

injury insurance, pension, housing and unemployment funds, as well as contribute to these funds on behalf of all employees in accordance with all relevant laws and regulations;

- retain one year of complete and accurate records and documentation, including employment contracts, residence and work permits (if applicable), proof of age documentation, maternity leave records, industrial injury reports, and work time and pay records, relating to employees in manufacturing and operations positions necessary to demonstrate compliance with these Guidelines, other than information and records that applicable law requires Vendor to retain for a shorter period of time;
- provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations, ensuring at a minimum, occupational safety, machine guarding, emergency preparedness, industrial hygiene, reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation;
- ensure that the same standards of health and safety are applied in any housing or canteen facilities that it provides for employees; and
- comply with all applicable environmental laws and regulations and ensure that all required environmental permits and registrations are obtained, maintained and kept current and that operational and reporting requirements are followed.

## HOW TO RAISE CONCERNS

You are encouraged to raise concerns about any issue or suspicions. If you are unsure whether a particular act constitutes modern slavery or human trafficking, or if you have any other issues, please do not hesitate to contact us at [uk.sales@accelalpha.com](mailto:uk.sales@accelalpha.com).