



# Accelya Modern Slavery Policy

Version 0.3

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## Revision History

Version	Date	Amendments	Author	Approver
0.1	August 2023	First version	Laurent Mather	Robert Wilson
0.2	January 2024	Addition of governance and responsibilities and review	Laurent Mather	ESG Team
0.3	January 2025	Minor amendments	Laurent Mather	ESG Team

## Security Classification

Select one	Level	Definition
<input checked="" type="radio"/>	<b>Public</b>	Information that may be broadly distributed without causing damage to the organization, employees and stakeholders.
<input type="radio"/>	<b>Internal</b>	Information that can be distributed within the company.
<input type="radio"/>	<b>Confidential</b>	Sensitive information available within a group of people which must not be disclosed outside the organization without explicit permission of document owner.
<input type="radio"/>	<b>Highly Confidential</b>	Highly sensitive and critical information meant for a limited group which must not be disclosed outside the organization without explicit permission of document owner.



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## 1. Introduction, purpose and Scope

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### Introduction:

We have a responsibility both as a business and as individuals to tackle any form of Modern Slavery. We will not tolerate, facilitate or condone any form of Modern Slavery across our business or throughout our supply chain. This is supported through our Group Code of Conduct and Modern Slavery Statement.

### Purpose and Scope:

The purpose of this policy is to communicate and establish controls to ensure compliance with all Modern Slavery regulations as well as ensuring alignment to the organisation's ethical standards and our Code of Conduct.

The policy covers all company employees, contractors, suppliers and partners and is intended to ensure all are aware of the responsibilities they hold.

We also have several policies and statements relevant to Modern Slavery which should be read in conjunction with and supplement this policy. These include our Code of Conduct, Sustainable Procurement Policy, Supplier Code of Conduct, Whistleblowing Policy and annual Modern Slavery Statement all of which are published on the Accelya.com website.



## 2. Governance and allocation of responsibilities

### Governance:



### ESG Oversight Committee

The ESG Oversight Committee is comprised of the General Counsel and Chief Human Resources Officer. The committee provides guidance and advice to the Senior Leadership Team on Environmental, Social and Governance matters. The committee meets with the wider ESG team on the quarterly basis. This ensures that performance and progress is managed effectively, and urgent matters can be communicated directly to the Senior Leadership Team.

### The ESG Team

The ESG team comprises the VP Strategist, Environment, Sustainability and Governance (ESG), the Head of Ethics and Compliance and the VP of Diversity, Equity, and Inclusion.

### Responsibilities:

The Head of Ethics and Compliance is responsible for the implementation and continuing management of this policy.



### 3. What is Modern Slavery?

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Modern Slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced compulsory labour, bonded and child labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The latest International Labour Organisation estimates show there were 50 people living in Modern Slavery in 2021.

There is no typical victim of Modern Slavery, and some victims do not understand that they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of Modern Slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents;
- The person is acting as though they are being instructed or coached by someone else;
- The person allows others to speak for them when spoken to directly;
- The person is dropped off and collected from work;
- The person avoids eye contact, is withdrawn or appears frightened;
- The person does not seem to be able to contact friends or family freely;
- The person has limited social interaction or contact with people outside of their immediate environment.



The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

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## 4. Our Policy

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We have a zero tolerance policy of any form of slavery or human trafficking and we will take proactive steps to ensure that Modern Slavery is not taking place in any part of our business or supply chains.

We will not engage with organisations which facilitate any form of slavery including the use of child labour or forced labour, or which do not recognise freedom of association or collective bargaining.

We require that the suppliers and third-parties we work with should hold their own suppliers and third-parties to the same standards.

We seek to continually improve awareness of the practices necessary to combat slavery and human trafficking and assess the risk profile of our business in these areas.

Our zero-tolerance approach to Modern Slavery includes our commitment that:

- we will not allow any form of slavery or human trafficking to take place in any part of our business;
- we will not use child labour, nor will we use forced labour;
- we recognise freedom of association by permitting our employees to establish and join organisations of their own choosing without our permission; unless it contravenes our Conflicts of Interest Policy
- we will recognise all collective bargaining, works council and union agreements where required by local laws;
- we will comply with all relevant laws, statutes and regulations relating to modern slavery;
- we will publish Modern Slavery Statements in accordance with the relevant legislation;



- we require our suppliers and third-party providers to comply with the above; and to hold their own suppliers and third-parties to the same standards;
- we will seek to educate and raise awareness across our business in the identification and reporting of Modern Slavery.



## 5. Compliance and reporting Modern Slavery

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### Compliance:

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working within it.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels: directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, business partners and suppliers. We expect the highest standards of compliance to be upheld at all times.

We have a robust governance structure in place and take a risk-based approach to our contracting processes which are then kept under review. Suppliers or proposed suppliers are provided with our Supplier Code of Conduct, which is available on our website

We request individual company assessments and declarations where appropriate and, where appropriate, retain the right to audit our supplier's activities, where practical, both routinely and at times of any reasonable suspicion.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

If a supplier or partner is found to be in breach of this policy we may terminate our relationship and any contract or purchasing agreement in place.



## Reporting:

Employees, suppliers and third-party providers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

If you are an Accelya employee you must report any incidence or suspicion of Modern Slavery and/or human trafficking in any part of our business or supply chain to the Head of Ethics and Compliance via [ethics@accelya.com](mailto:ethics@accelya.com) . If you are a supplier or third-party provider to Accelya you should inform your primary business contact with us.

Alternatively, employees and all suppliers or partners can report any concerns using the third party, independent whistleblowing process, it can be accessed [here](#)

We encourage openness and will support anyone who raises genuine concerns with the company whistleblowing policy, even if they turn out to be mistaken.

Reports are treated in accordance with our whistleblowing policy, acknowledged and acted upon as appropriate.



## 6. Targets

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Our target is that we have zero instances of Modern Slavery anywhere in our business globally or within our supply chain.



## 7. Review

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This policy will be reviewed annually by the ESG team and updated to ensure compliance with both legal requirements and best practice.