

Modern Slavery Statement

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31 October 2025

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Change history

Version number	Date of change	Change made by	Nature of and reason for change
0.1	July 2022	DMCH	Initial draft of policy for review
0.2	August 2022	DMCH, BJW	Initial review
1.0	April 2024	MJM	Final review
1.1	May 2024	SM, JN, NA	Risk assessment conducted. Policy updated to include results and address changes to KPIs
1.2	October 2025	DMCH, RS	Annual review and update
1.3	October 2025	DMCH	Final review

1 Board of Directors' Foreword

- 1.1 Actica's mission is to help our clients deliver better, more secure, more efficient business services that ultimately make a difference to their customers and citizens of the UK.
- 1.2 Our business aims and ethics are incompatible with the human suffering and issues caused by modern slavery and Actica is committed to meeting its legal obligations and supporting wider HMG objectives to eradicate modern slavery and human trafficking. We continue to improve risk identification and mitigation in our supply chains of goods and services, and are taking steps to safeguard human rights, protect vulnerable workers from exploitation and ensure we do not inadvertently fund criminal activity.
- 1.3 This statement outlines the steps we have taken, and plan to take in future, to prevent modern slavery in Actica's supply chains. We have updated our goals for the forthcoming year and will report our progress against these in future statements. These will continue to evolve as our strategies mature and we learn more about the risk of modern slavery in our supply chains. We will continuously review and improve our policies and process guidance, taking input from stakeholders.
- 1.4 We completed the government-developed Modern Slavery Assessment Tool (MSAT) in 2022 and have used the resulting recommendations as a start point in helping understand our current approach to mitigating risks of slavery and forming the basis for identifying actions required in improvement plans. We will undertake a re-assessment using the tool this financial year.
- 1.5 We use our own risk assessment tool to carry out assessments of our supply chain, including a comprehensive mapping of our suppliers. We continue to refine this tool and improve its use. We are using findings from our risk assessment to inform training for our commercial staff and wider stakeholders within the company, promoting social value and modern slavery awareness and understanding of where elevated risks are present, to ensure we can monitor and reduce the risk of slavery occurring within our supply chains.
- 1.6 Actica is a member of various industry bodies where best practice can be shared and where we can collaborate with and learn from other organisations, helping us shape our future strategy, and prioritise our approach.
- 1.7 This Modern Slavery Statement covers Actica's 2024-25 financial year, and has been approved by the Actica Board of Directors.

Signed:  **Dr Michael Murphy, Chief Executive Officer**

2 Organisational Structure, Operations, Activities and Supply Chains

2.1 Organisational context, products, sectors and services

2.1.1 Actica Consulting Ltd ('Actica') focuses on delivery of high value technical consultancy services into the public and private sector, primarily for customers located and operating in the UK. In FY 24/25, we provided services to a value of £49.18M.

2.1.2 We provide our services in a number of ways. Much of our work is carried out on a hybrid basis involving both colocation of our staff with our customers and remote working, including as part of blended teams working with other 3rd party organisations.

2.1.3 Actica is based at the Surrey Research Park, Guildford and employs around 250 people, the majority as consulting staff.

2.2 Supply chain understanding

2.2.1 A review of Actica's supply chains is conducted annually, following the end of each Financial Year. Tier 1 (direct) suppliers are identified from Actica's financial records. Mapping beyond Tier 1 will be considered only where a Tier 1 supplier is found to present a high level of risk following risk screening using our in-house tooling, or where further investigation of suppliers assessed as presenting a medium risk has resulted in specific concerns.

2.2.2 We are currently unsighted on the Modern Slavery risk presented by suppliers upstream of Tier 1 (indirect suppliers), as Actica does not currently hold contracts which are assessed as being at high risk for Modern Slavery.

2.3 Supplier industries and locations

2.3.1 In FY 24-25, Actica used 195 suppliers distributed across a number of sectors as shown in Table 1.

Category	Number of suppliers	% of spend
Consulting	59	58.5%
Recruitment	10	13.8%
Other Services	65	13.4%
Technology and digital services	31	11.1%
Training	9	1.3%
Goods	14	1.1%
Facilities	4	0.7%
Travel	3	0.2%

Table 1: Actica Supply Chain Analysis

2.3.2 The majority of spend supplements the internal Actica workforce on delivery of consultancy. For these contracts, all people supplied are individually identified, are UK nationals and subject to National Security Vetting. Given these controls, we consider the risk of modern slavery to be negligible for these contracts.

2.3.3 Figure 1 shows the geographical location of our supplier base.

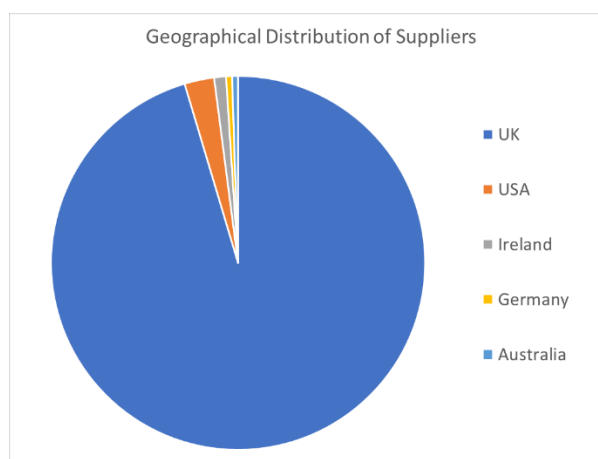


Figure 1: Supplier locations

2.3.4 Over 95% of Actica's suppliers, accounting for 99.5% of Actica's spend is with UK-based organisations. The remainder is with organisations based in the EU, USA or Australia.

2.4 Modern slavery risk management governance

2.4.1 Actica's Anti-Bribery and Corruption Officer (ABCO), an Actica Director, is responsible for this modern slavery statement, including the policies and commitments it contains. Actica's ABCO also provides Director-level anti-slavery advocacy and is responsible for ensuring Modern Slavery risks are identified, assessed and responded to.

2.4.2 KPI reports, Modern Slavery incidents and risks are presented to the Actica Management Board. Each annual Modern Slavery Statement will be presented to the Board for endorsement, then signed by Actica's Chief Executive Officer prior to publication.

2.4.3 Policies are reviewed:

- a. following any significant change to relevant legislation; and
- b. following any incident to which relevant policies apply.

2.5 Information gathering

2.5.1 In developing our understanding of the legislative requirements and the type of response required, we have used numerous information sources. These include but are not limited to:

- a. UK legislation;
- b. Statutory guidance on transparency in supply chains;
- c. Input from peer organisations and industrial bodies;
- d. Output from the UK government's Modern Slavery Assessment Tool.

2.5.2 Risk screening of our supplier base underpins our response to the risk of modern slavery within our supply chains. We use an in-house tool to screen all suppliers used in the previous financial year, and which can be used on an ongoing basis. The information sources used to inform our modern slavery risk assessment include but are not limited to:

- a. Actica's Suppliers List;
- b. Suppliers' websites;
- c. Office of National Statistics;
- d. Accrediting bodies:
 - 1. Living Wage Foundation;
 - 2. The Good Shopping Guide;
- e. Modern Slavery Statement Registry;
- f. Companies House.

We have a supplier questionnaire which can be used in cases where it is assessed that a greater level of understanding of supplier commitments and actions ensuring ethical and fair practices would be beneficial to inform our risk assessment.

2.6 Stakeholder engagement

- 2.6.1 We have taken a risk-based approach to mapping our supply chain, screening all Tier 1 suppliers and progressing to further tiers only where we are not satisfied that the risk of modern slavery presented by a Tier 1 supplier is low. Unless the need to map further tiers of suppliers is indicated by our risk assessment, Actica does not engage external stakeholders in mapping its supply chain.
- 2.6.2 Our annual exercise to map and risk screen all Tier 1 suppliers found a generally low level of risk in our supply chain, with eight suppliers initially assessed to be medium risk, and none presenting high risk. On further investigation, the vast majority of spend with those suppliers assessed as posing medium risk was for subcontractors or recruitment services, for which Actica's personnel controls provide effective mitigation of the risk of Modern Slavery.

2.7 Continuous improvement

- 2.7.1 Since the previous statement, we have updated our mapping and assessment of our supply chains to cover all suppliers active in FY 24/25, to ensure our understanding remains current.
- 2.7.2 In the past year, we have also developed a Supplier Questionnaire which can be used to solicit further information from our Tier 1 suppliers about their organisation, commitments to ethical practices and ensuring of a responsible supply chain. This enables targeted information gathering requests where it is deemed beneficial to better understand the risk posed by our Tier 1 suppliers and their own supply chains. We will refine this supplier questionnaire in FY 25-26.

3 Organisational Policies of Relevance to Modern Slavery, Forced Labour and Child Labour

3.1 Internal operating policies

3.1.1 Modern Slavery Policy

3.1.1.1 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, agents, contractors and suppliers.

3.1.1.2 Actica Consulting strictly prohibits the use of modern slavery and human trafficking in our operations and supply chains. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

3.1.1.3 Actica is committed to assuring in our organisation and supply chains as far as is possible:

- a. Adherence to local and national laws;
- b. Freedom of workers to terminate employment;
- c. Freedom of movement;
- d. Freedom of association;
- e. Prohibition of any threat of violence, harassment and intimidation;
- f. Prohibition of the use of worker-paid recruitment fees;
- g. Prohibition of compulsory overtime;
- h. Prohibition of child labour;
- i. Prohibition of discrimination;
- j. Prohibition of confiscation of workers' original identification documents;
- k. Provision of access to remedy, compensation and justice for victims of modern slavery.

These conditions are addressed within supplier and employee contracts.

3.1.1.4 Actica supports these principles through the processes outlined in this document, communicating effectively, developing and implementing appropriate staff training, providing appropriate resourcing and collaborating with external parties and stakeholders.

3.1.1.5 We expect that our suppliers will hold their own suppliers to the same high standards.

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- 3.1.1.6 We are committed to developing internal awareness, training and working with our suppliers where beneficial, including monitoring any improvement plans.
- 3.1.2 Other internal policies and practices of relevance to modern slavery**
- 3.1.2.1 **Conduct.** Many of the practices and procedures of relevance to managing the risk of modern slavery are enshrined within our employee and supplier contracts, for example expectations for conduct and the sanctions which apply if standards are not met. This provides a highly effective means of communication of these expectations to suppliers and employees.
- 3.1.2.2 **Employee Terms and Conditions.** In line with our corporate values, all of Actica's employees are paid above the UK National Living Wage. All our employees are freely able to terminate their employment. Whilst our employees have freedom of movement, freedom of association and collective bargaining, many roles require UK security clearances to be maintained which can entail acceptance of some limitations on activity. Actica does not employ under 18s, and does not confiscate workers' original identity documents.
- 3.1.2.3 **Recruitment.** In addition to direct recruitment, Actica uses a limited number of recruitment agencies, none of which have worker-paid recruitment fees. Any recruitment agency found to be engaging in the practice of worker-paid recruitment fees will immediately have their contract terminated. During onboarding, we seek the opinion of new hires on the recruitment process, including their experiences with recruitment agencies, if relevant. We review our recruitment suppliers at least annually to ensure continued satisfactory performance, including ethical practices.
- 3.1.2.4 **Purchasing.** The administration function within Actica is responsible for overseeing procurement and ongoing management of contracts. Functions within the business are permitted to purchase small items/consumables up to a value of £2,000 with permission of a director. All other procurement has to be signed off by the CEO or CFO. Our purchasing procedures include consideration of the modern slavery risk. We award contracts on the basis of competition between potential suppliers, unless there are compelling reasons or constraints on the service/product being purchased as to why competition cannot be used.
- 3.1.2.5 **Consulting.** Due to the nature of Actica's business, where we use subcontractors in delivery of consultancy services, any staff working on those contracts are individually identified, UK nationals and/or hold UK HMG security clearance.
- 3.1.2.6 Where material is releasable, it is published on our website or available on request. Commercially sensitive material, or otherwise restricted material is not publicly available.

3.2 Alignment with International Standards

- 3.2.1 We have carefully considered international standards in developing our policies. We identify, prevent and mitigate risks of modern slavery, perform due diligence checks within our supply chain and engage stakeholders where beneficial and appropriate to the nature of our business, reflecting the UN Guiding Principles on Business and Human Rights. In adopting a risk-based approach complemented with continuous improvement and reporting transparency, we have mirrored the OECD Due Diligence Guidance for Responsible Business Conduct. In prohibiting forced and compulsory labour, paying a living wage to all our employees and paying fair prices for goods and services, we promote decent working conditions throughout our supply chains, aligning with ILO Labour Standards.

3.3 Stakeholder engagement

- 3.3.1 Our corporate values are incompatible with tolerance of modern slavery. Due to the nature and context of our work, we have not widely engaged external parties in the development and implementation of our modern slavery policies. We have, however, learnt heavily on the indicators of good practice within the statutory guidance, and aligned with international standards as described above. We have leveraged NGO publications and review of publicly-available modern slavery statement to identify areas of good and best practice, adopting these where feasible for our business.

3.4 Communication and Enforcement

- 3.4.1 Expectations for supplier, subcontractor and employee conduct are contained within our contracts, providing for effective communication and enforcement.
- 3.4.2 Internal policies are made freely available to all Actica staff.

3.5 Continuous Improvement

- 3.5.1 Since our previous statement, we have re-structured our Modern Slavery statement to better reflect and align with the UK's statutory guidance, and to clarify the relationship of the elements of this statement to requirements. Our over-arching policies and expectations have not changed significantly since our previous statement, and we continue to review and monitor government and industry guidance and update our policies as needed.
- 3.5.2 We will be improving the internal communication of our policies in the coming year.

4 Risk Management Processes

4.1 Risk assessment frequency and governance

4.1.1 Actica's Anti-Bribery and Corruption Officer (ABCO) is responsible for ensuring the modern slavery risk posed by Actica's suppliers is assessed and acted upon. Risk assessment is conducted by a small team assembled under the leadership of the ABCO as and when update is required.

4.1.2 Following identification and mapping of the supply chains, we conducted risk screening of all Tier 1 suppliers. This screening exercise occurs at a minimum following the completion of each company financial year. The most recent revision to the Supplier Risk Assessment was completed in Oct 2025 and addressed all suppliers in FY 24-25. We continue to review the frequency of our assessments, and refinement of the approach. It is intended that a risk-prioritised approach will be taken to future screening exercises which is more commensurate with the low level of risk generally found amongst our suppliers.

4.2 Identifying and assessing risks

4.2.1 Information sources used in the risk assessment include:

- a. Actica's Suppliers List;
- b. Supplier websites;
- c. Office of National Statistics;
- d. Accrediting bodies:
 - 1. Living wage foundation;
 - 2. The Good Shopping Guide;
- e. Modern slavery statement registry;
- f. Companies house.

4.2.2 For a given supplier, the risk assessment correlates an assessment of the likelihood of there being a modern slavery risk for a particular contract (e.g. by assessment against available information about the contract organisation, sector, location, type of service, and historical evidence, using sources such as globalslaveryindex.org) plotted against the value of contract, to provide a measure of impact.

4.2.3 Supply chain mapping and supplier risk assessment is limited to Actica's Tier 1 suppliers in the first instance. Where suppliers are assessed to be high risk and

where circumstances warrant this, we may seek further information from the supplier about their own supply chains' risks of modern slavery.

- 4.2.4 As part of our ongoing risk assessment and due diligence processes for any suppliers assessed as high risk, we consider whether circumstances warrant us carrying out audits of suppliers for their compliance with the Modern Slavery Act 2015.
- 4.2.5 All suppliers with active contracts in FY 24-25 have been assessed using Actica's modern slavery risk assessment digital tool. All new technology contracts meeting the thresholds specified in our KPIs are risk-assessed prior to contract acceptance/signing and any further actions deemed necessary are performed.
- 4.2.6 Due to the nature of Actica's business, any contracts where we employ subcontractors whose staff working for Actica are individually identified, UK nationals and/or hold UK HMG security clearance, and are automatically considered to be low risk.
- 4.2.7 The risk assessment process generates a risk rating for each supplier using a 5x5 grid from low to high:

RISK MATRIX					
	LIKELIHOOD				
IMPACT	VERY LOW	LOW	MEDIUM	HIGH	VERY HIGH
SEVERE	MEDIUM	MEDIUM	HIGH	HIGH	HIGH
SIGNIFICANT	LOW	MEDIUM	MEDIUM	HIGH	HIGH
MODERATE	LOW	LOW	MEDIUM	MEDIUM	HIGH
MINOR	LOW	LOW	LOW	MEDIUM	MEDIUM
INSIGNIFICANT	LOW	LOW	LOW	LOW	MEDIUM

Table 2 – 5x5 Risk Matrix

4.3 Highest priority risks to workers

- 4.3.1 The results of the supplier screening indicated:
- 186 suppliers were assessed to be low risk, with no further action taken.
 - 8 suppliers were assessed to present medium risk.
- 4.3.2 The risk identified by sector following the supplier screening, for the top five sectors by spend, is shown in Figure 2.

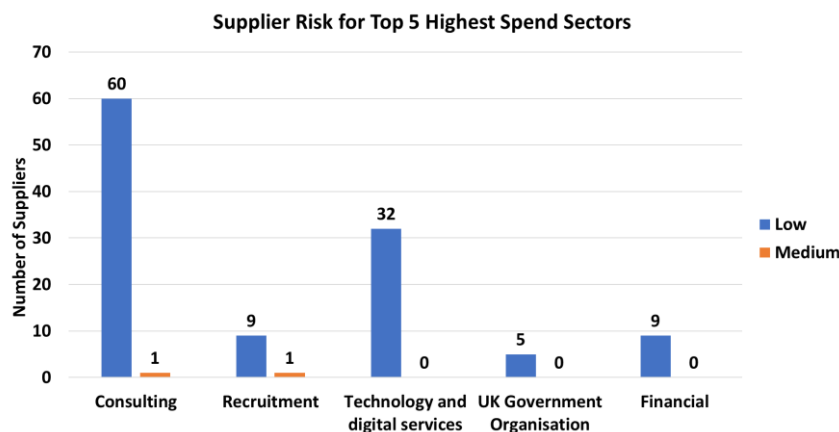


Figure 2: Risk by sector (top five sectors by spend)

4.3.3 All suppliers assessed as medium risk following the screening exercise were investigated further, including review of their modern slavery documentation where available. Of these:

1. One recruitment supplier and one consultancy supplier, together accounting for a total spend of £2.8m, were identified as presenting medium risk. Due to the criteria and controls which are applied to the personnel we hire or subcontract for client delivery, further consideration enabled the supply chain risk presented by these suppliers to be re-assessed as negligible.
2. The six remaining suppliers assessed as medium risk accounted for a total spend of £231k, 1.6% of total supplier spend across various goods and services. Further consideration of these suppliers and the modern slavery risk presented by them yielded three categories of spend in which targeted due diligence could realistically yield a greater level of assurance.

4.4 Stakeholder engagement

4.4.1 Stakeholder engagement in support of our supplier risk screening is largely with internal stakeholders and supplemented by open-source information. Our procurement staff provide details of spend by supplier and help identify further details of those suppliers' businesses, and the sector(s) they operate in. Risk factors associated with those sectors are obtained from open-source information, including that provided by NGOs, industry initiatives, and from government agencies. Where the risk screening requires further engagement, we deal directly with our suppliers, including subcontractors, to identify, understand and address the risks presented.

4.4.2 As recruitment is an area identified to present a higher level of risk, we seek the personal experiences from new hires to ensure our recruitment suppliers are

operating in line with our expectations, in addition to undertaking the broader risk screening outlined above.

4.5 Continuous improvement

- 4.5.1 Since our previous statement, risk assessment has now been built into our change process with high-value contracts (>£500k) being screened for modern slavery risk prior to agreement. Our broader supplier review is now being completed on an annual basis. Impact assessment of new contracts considers modern slavery risks. We have also refined our screening process with improved consistency in assessing the number of indirect supplier tiers.

5 Due Diligence Processes

5.1 Prevention and mitigation of modern slavery and other human rights abuses

5.1.1 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

5.1.2 In developing our risk-based approach to Modern Slavery management, we have reviewed the UN Guiding Principles, OECD Due Diligence Guidance for Responsible Business Conduct, ILO Labour Standards, and materials from GBCAT and TechUK's Responsible Business Conduct Group to identify best practice and lessons learned which we can implement in our policies and procedures.

5.1.3 Actica has implemented a number of measures within procurement and contract management that will reduce the risk of Modern Slavery and other abuses of human rights within the supply chain, including:

- a. Carrying out due diligence on new contracts including confirmation, for large contracts (over £500K), that organisations have suitable Modern Slavery statements available indicating their commitments in this area;
- b. Not routinely contracting with organisations known to have been convicted of child labour, human trafficking or other breaches of the Modern Slavery Act (2015);
- c. Prompt payment of contract invoices under the agreed terms (usually 30 days).

5.1.4 Further measures to be adopted within procurement and contract management that will reduce the risk within the supply chain include:

- a. Carrying out assurance checks during the lifespan of contracts not less than every 3 years;
- b. Putting in place a training and awareness programme for relevant staff, plus an information page on the Actica internal intranet;
- c. Iterative setting of goals and KPIs that will allow Actica Senior Leadership to monitor and measure the effectiveness of this policy, and support an agreed programme of continuous improvement in managing the risks of modern slavery and other human rights abuses within our supply chains.
- d. Consistent with our risk-based approach we may require:
 1. Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with the Modern Slavery Act 2015 and a commitment against Human Trafficking.

2. Suppliers engaging workers through a third party to obtain those third parties' agreement to adhere to the Modern Slavery Act 2015.
3. Suppliers of any goods and/or services to provide further details of their organisation and commitments to ethical and fair practices, by completing our supplier questionnaire.

5.2 Supplier and worker engagement and human rights due diligence approach

5.2.1 Actica expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against abuses of human rights, including modern slavery:

- a. We have a zero-tolerance approach to modern slavery in our organisation and our supply chains and will implement a set of activities that will continually monitor for infringements to this policy.
- b. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- c. We engage with relevant stakeholders and suppliers to address the risk of modern slavery and human rights abuses in our operations and supply chain.
- d. We take a formal risk-based approach to our procurement and contracting processes and keep them under review. We have assessed our supply chain by carrying out risk assessment of all existing contracts to determine via a structured method the level of risk of modern slavery on a three-point, low, medium, or high scale. All future contracts will be assessed in line with our Key Performance Indicators (KPIs) and an assessment of this is embedded in our change process.
- e. For contracts assessed as at high or medium risk and for which further investigation does not provide an appropriate level of assurance, we assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- f. For those contracts assessed as high risk using our risk-based approach, we also consider writing to suppliers requiring them to make specific undertakings in respect of combating modern slavery and trafficking.
- g. Ultimately, if an appropriate degree of assurance cannot be obtained that the risk of modern slavery can be mitigated effectively, Actica may terminate supplier contracts.

5.2.2 Our onboarding procedures provide an example of collaboration with suppliers and workers to prevent modern slavery. We carefully vet and monitor our recruitment agencies to ensure their practices align with our policies, and we

engage with new joiners to review their experiences of the recruitment agencies we use.

5.3 Grievance mechanisms

- 5.3.1 We have put in place formal escalation routes for staff if there are concerns or reports of breaches of this policy. Initially these will be sent to the Actica ABCO and will be investigated within 5 working days to determine the further actions required. We are currently assessing options for an anonymous whistleblowing route for staff to raise concerns, with the aim of implementing this in FY 25-26.

5.4 Remediation policies and processes

- 5.4.1 If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated within agreed timescales and whether it might represent the best outcome for those individuals impacted by the breach to terminate such relationships.

5.5 Incidents of modern slavery

- 5.5.1 We have found no incidences of Modern Slavery across our supply chains during assessment of Actica's 24-25 financial year.
- 5.5.2 No suppliers are known to have committed human rights offences in the past year.
- 5.5.3 We are monitoring one open complaint raised with the UK NCP against a supplier.

5.6 Business model

- 5.6.1 Our business-related KPIs have been reviewed by Actica's ABCO and confirmed as not contributing to the risk of modern slavery in Actica's operations and supply chains.
- 5.6.2 Actica does not explicitly incentivise mitigation of modern slavery, however the responsibility for management of our modern slavery risk is clearly placed within the remit of an Actica Director, and measures such as the inclusion of expected behaviours and practices in employee and supplier contracts and ability to terminate contracts provide some degree of incentivisation to mitigate modern slavery risks. We believe our procedural controls are appropriate to the level of modern slavery risk currently faced by our business.

5.7 Stakeholder engagement

- 5.7.1 We have not participated in peer-learning groups for these purposes in FY 24-25, however we are planning to engage with TechUK's Responsible Business Conduct Group, sharing and learning from experiences with the Modern Slavery Act and various approaches to compliance taken across the tech industry. This will also provide opportunities for our staff engaged in Modern Slavery compliance to network with a range of compliance and sustainable procurement professionals.

5.8 Continuous Improvement

- 5.8.1 Since our previous statement, we have embedded consideration of supplier reputability and consideration of whether supplier nationality presents any issues or concerns into our standard change procedures for hardware, software, and cloud services.
- 5.8.2 In the coming year, we will roll out training to all procurement staff which will include awareness of the findings of the most recent supplier risk screening and the sectors of most concerns, to inform ongoing due diligence. We are currently assessing options for a whistleblowing route for staff to raise concerns anonymously within Actica, with the aim of implementing this in FY 25-26.

6 Training and Awareness

6.1 Internal and external training, materials and development

- 6.1.1 To ensure a high level of understanding of the risks of modern slavery and wider social value awareness, Actica is committed to promoting learning by offering training to all our relevant staff. Training will not be confined to staff responsible for procurement, however, and we will promote wider learning to our staff managing operational contracts by:
- a. Maintaining a modern slavery information page on the Actica intranet wiki to help staff identify any potential risks or issues.
 - b. Incorporating modern slavery and social value into induction training for new staff.
 - c. Looking at collaboration opportunities to share lessons and best practice with other similar organisations through the membership of trade bodies.
- 6.1.2 Our training materials are largely developed in-house and supplemented by publicly-available reference materials, templates and guidance. Training delivery occurs through various methods including peer guidance, presentations to staff during company-wide meetings, and delivery of tailored materials, either live or via recorded presentations.
- 6.1.3 We provide guidance and a documented methodology for the team undertaking supplier risk assessments, ensuring comparability of the approach year on year. Our methodology document has been updated in the past year, providing more comprehensive guidance with less assumed knowledge.

6.1.4 Our Modern Slavery training approach is described in Table 2. This has been formalised since our previous statement.

Intended Audience	Content	Learning Objectives	Learning Outcomes	Materials and delivery	Numbers trained in FY 24-25	When does training occur
All staff	Modern Slavery Awareness, including ILO Forced Labour Indicators and reporting mechanisms	- What Modern Slavery is - Actica's Modern Slavery risks / context - How staff members can report concerns	- Staff can explain what modern slavery is - Staff understand the indicators of Modern Slavery - Staff are aware of the areas of Actica's supply chains that present the highest risk - Staff understand when and how to report suspicions and concerns of Modern Slavery, generally, and within Actica's supply chains.	- Modern Slavery briefing, provided as induction reading to all staff - Internal wiki page on Modern Slavery	Zero (new material developed Sep 25)	As part of company induction
Modern Slavery Risk Management Team	Modern Slavery Risk Management in Actica	- Understand how Actica undertakes its risk management - Understand Actica's obligations in respect of the Modern Slavery Act and the requirements for a Modern Slavery Statement - Understand in detail obligations under S54 of the Modern Slavery Act 2015	- Staff are competent to update Actica's Modern Slavery Risk Assessment and Statement	- Extract from Legislation - UK Statutory Guidance on Transparency in Supply Chains - Actica Risk Assessment methodology - Previous Modern Slavery Statement - [to be created] Guidance for update of MSS	2	On joining the team for the first time
Talent Acquisition Staff		- Understand the need and how to undertake due diligence of relevance to Modern Slavery and their role	- Staff are equipped to ensure recruiters are taking appropriate steps to mitigate against Modern Slavery in their own practices and supply chains		0	
Those most at risk of exploitation	N/A. Due to the low level of risk of Modern Slavery within our organisation and supply chains, Actica does not focus training on groups at any significant risk of being victims of Modern Slavery.					
Human Resource Staff	N/A. Due to the nature of our business, there is negligible risk of modern slavery within our organisation.					
Executive-level staff	- Presentation of findings and outcomes from Supply Chain risk assessment. - Progress towards goals and KPIs for previous FY. - Goals / KPIs for the current FY. - Draft MSS for endorsement	Executive-level staff: - are aware of the findings of the risk assessment, and any actions taken as a result; - are aware of the continuous improvement delivered in the previous Financial Year and planned for the current Financial Year. - are provided with the opportunity to endorse the MSS or otherwise.	Executive-level staff: - can provide feedback and direction on Actica's Modern Slavery Management practices; - are sufficiently informed to provide meaningful endorsement of the MSS, or otherwise.	Slidepack.	1	Annually, following completion of risk assessment updates and mature draft of Modern Slavery Statement
Procurement Staff			- Staff understand how to consider Modern Slavery Requirements in procurement - Staff understand how to undertake supplier due diligence of relevance to Modern Slavery risk mitigation and their role.	Presentation with opportunity for Q&A.	Zero (new materials to be developed in late 2025)	
Consulting Staff	N/A. Our consulting staff do not require Modern Slavery training which is additional to that provided to all staff.					
Suppliers	N/A. Due to the generally low level of risk within our supply chains, and the measures we apply to any contracts with suppliers who are found to present a medium risk of					
The wider community	N/A. Due to the specifics of our supply chains and the type of work which Actica typically undertakes, there is little value in Actica delivering Modern Slavery training to the wider community.					

Table 2: Modern Slavery training approach

6.2 Continuous improvement

6.2.1 Our training materials have matured since our previous statement and are now more comprehensive, current and tailored. Training materials will continue to be developed and improved over FY 25-26.

7 Assessment of Effectiveness

7.1 Goals, KPIs, Monitoring and Evaluation

- 7.1.1 This section provides an overview of our performance and successes against the outcomes set out in the government's MSAT toolset. Our strategy will evolve as our knowledge of our supply chains and best practice develops, and future goals and KPIs will be updated or developed to reflect this.
- 7.1.2 The responsibility for setting goals and KPIs relevant to managing Actica's Modern Slavery risks and tracking their implementation lies with Actica's ABCO. Some goals have already been completed, some are ongoing, and some are new for FY 25-26. KPIs have been developed to measure effectiveness, including staff training, action plans for monitoring risks and checks on supplier and payment performance.
- 7.1.3 We use the government's Modern Slavery Assessment tool to provide indications of where we can improve our practices. Actica most recently completed the MSAT tool in 2022, and we have responded to the recommendations received to improve our management of modern slavery risks.
- 7.1.4 Table 3 outlines our goals, the associated qualitative and quantitative measures and KPIs, actions taken and the current achievement status. Further KPIs relating to goals set in past years are provided in Table 4.

R	Theme	Goal	Associated KPI or measure	Date agree	Status	What we've done
G1	Governance	Appoint an anti-slavery advocate at director level to help oversee activity and increase awareness of action to take.	See KPI table	Apr-24	Complete	We have appointed an Actica Director as the Anti-Bribery and Corruption Officer.
G2	Assurance	Develop KPIs to help us understand whether the action we are taking is working well and where we need to improve.		Apr-24	Complete	We have monitored our initial set of KPIs over FY24-25 and have reviewed these for ongoing relevance as part of continual improvement.
G3	Policy	Review, and where relevant, amend procurement policies to incorporate MS statements.		Apr-24	Ongoing	This is underway.
G4	Risk assessment and management	Begin contract risk assessments to ensure action plans are targeted.		Apr-24	Complete	Internal risk assessment has been completed and actions identified and implemented for any suppliers not deemed to present low risk.
G5	Risk assessment and management	Investigate, analyse and take action where required for all Medium and High-risk suppliers.		Apr-24	Complete	Further investigation has been undertaken for medium risk suppliers, actions identified and implemented. No suppliers were found to be high risk.
G6	Training and Awareness	Participate in training and awareness.		Apr-24	Ongoing	All staff are now briefed at induction. Further, planned actions include developing additional training for specific roles, and creating an updated Modern Slavery page on the internal Actica wiki.
G7	Assurance	Revise Actica's MSAT assessment and use recommendations to inform subsequent goal-setting.	Revised MSAT assessment complete by 31 Dec 25.	Oct-25	New	
G8	Assurance	Additional goals, associated measures and delivery resources confirmed.	- Goals set by 28 Feb 26. - Internal project to deliver to these goals established and resourced by 31 Mar 26.	Oct-25	New	
G9	Training and Awareness	Complete development of and baseline revised training materials, as detailed in [training table].	- Induction Training to be delivered to all staff on joining the company to be in place by 31 Dec 25. - All products identified in the [training table] released for use by 30 Jun 26.	Oct-25	New	
G10	Due Diligence	Prompt payment of invoices, to meet the Fair Payment Code Awards Gold Award Level	- 95% of all undisputed and valid invoices paid within 30 days of invoice receipt; - 100% of undisputed and valid invoices paid within 60 days of invoice receipt.	Oct-25	New	This is a revision of a previous KPI to simplify reporting. Actica aim to pay all valid and undisputed invoices within 30 days of receipt.
G11	Risk Assessment and management	Risk screenings for all active suppliers are regularly reviewed.	All active suppliers to have been risk screened within the past four years. All suppliers providing over £250k goods / services in a FY to be screened as part of the annual reporting cycle.	Oct-25	New	This is a refinement of our screening process which incorporates learning from experience to date and a risk-based approach.

Table 3: Prior and current goals

Ref	Theme	Description	Status
KPI 1	<i>Risk assessment and management</i>	Risk Assessments for all new procurements above £500,000 threshold by Q4/24.	This has been completed for all technology-related and personnel procurements which are areas of higher risk.
KPI 2	<i>Risk assessment and management</i>	Detailed mapping and assessment of existing Actica supply chain complete by 31/10/24.	Complete.
KPI 3	<i>Due diligence processes</i>	All high or medium risk contracts will be investigated by 31/12/24.	Complete.
KPI 4	<i>Due diligence processes</i>	All new high or medium risk contracts will be investigated by 30/06/25.	Complete. All suppliers screened to be medium risk were investigated further to a satisfactory conclusion.
KPI 5	<i>Due diligence processes</i>	All undisputed and valid invoices paid within 30 days.	Over 95% of invoices were paid within 30 days.
KPI 6	<i>Training and awareness</i>	All relevant staff to have completed modern slavery training.	Ongoing.
KPI 7	<i>Training and awareness</i>	Modern slavery elements to be included within the new staff induction briefing.	Complete.
KPI 8	<i>Assurance</i>	Risk register of actions to be developed to show modern slavery improvement plans within the next 12 months to end 07/25.	Not completed - following assessment of the risk within Actica's supply chains, we determined that existing control measures are sufficient and proportionate to the present level of risk.

Table 4: Previous KPIs

7.2 Evidencing outcomes, utilising findings and success stories

7.2.1 Actions to monitor and mitigate risks of modern slavery are incorporated into Actica's procurement and commercial processes. These include ensuring we are not doing business with any organisation known to have been convicted of child labour, human trafficking or other breaches of the Modern Slavery Act (2015), and conducting due diligence on new contracts including, for large contracts (over £500K), confirming that organisations have suitable Modern Slavery Statements.

7.3 Stakeholder engagement

7.3.1 We have worked with internal stakeholders including our finance, HR and security teams to implement measures which enable our goals to be achieved, and to obtain accurate reporting on the KPIs set previously. To date, it has not been necessary to engage widely externally.

7.4 Continuous improvement

7.4.1 Since our previous statement, we have processes in place to carry out annual assessments of the Actica supply chain to maintain transparency and insight into our contracts. We will re-assess our Modern Slavery Management using the MSAT tool in FY 25-26 and subsequently review and update our goals and KPIs having considered the output from the MSAT assessment. We will continue to take action to identify, mitigate and manage modern slavery risks in supply chains in FY 25-26.