Modern Slavery Policy

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1. Document Control

Version Control

Date	Version	Changes	Author
29/01/2026	V1.0	Full review and re-write, now covering whole of AKG UK. Replaces HR025 and HF023	Laura Gibbon, Director of People and Culture.

A current version of this policy document is available to all staff on the AKG Hub or relevant policy area.

Policy Ownership

Name and Position	Role	
Laura Gibbon, Director of People and Culture.	Policy Owner	**Accountable** for this policy, ensuring it is fit for purpose, aligned to AKG's vision and values, and for promoting adoption across AKG.
People and Culture team	Policy Lead	**Responsible** for supporting the Policy Owner in the development and continual review of the policy.
AKG UK Business Leadership Team	Consulted	Must be included in the development and review of the policy on behalf of their AKG Business Area, or function.

All AKG UK policies are approved by the AKG Country Manager.

Policy Scope

This policy relates to the following AKG UK Business Areas:

AKG Employment	AKG Learning	AKG Health	Intuitive Thinking Skills
Yes	**Yes**	**Yes**	**Yes**

Any variations in the policy relating to these Business Areas will be clearly articulated in the policy and through associated Annexes. Otherwise, the policy applies equally to all businesses identified as in scope.

Where a Business Area is out of scope, they will have their own policy made available through the AKG Hub or relevant policy area.

This policy applies to all employees, contractors, suppliers, and business partners, and supports our compliance with the UK Modern Slavery Act 2015 and other relevant legislation. This policy does not form part of your contract of employment, and we may amend it at any time.

Associated documents:

- Whistleblowing Policy
- Employee Safeguarding Policy
- Safeguarding (including Prevent Duty) Guidance Policy and Procedure

Third Parties

We reserve the right to engage an independent third party for support and expertise regarding actions relating to this policy.

Document Review Arrangements

The policy will be reviewed at least annually, sooner in the event of any material changes to the business potentially impacting the policy area.

Next Review Date:	01 February 2027

2. Introduction and policy overview

Summary

We are committed to upholding the highest standards of ethical conduct and human rights. We recognise that modern slavery, including forced labour, human trafficking, and exploitation, is a serious global issue that affects individuals and communities across all sectors and supply chains.

This policy outlines our commitment to preventing modern slavery in all its forms within our operations and supply chains. We are dedicated to promoting transparency, accountability, and responsible business practices, and we expect the same commitment from those we work with.

Roles and responsibilities

The policy is relevant to all colleagues within the business identified as 'in scope'. All colleagues must ensure they have ready and understood the policy and that they are adhering to it in their work for AKG. Managers are also responsible for supporting their teams to adhere to the policy, taking appropriate steps to provide additional support and guidance wherever this is not the case.

Role	Responsibilities and accountabilities
Employee	Remain Vigilant: Be aware of the signs of modern slavery and human trafficking in the workplace or supply chain. Report Concerns: Promptly raise any suspicions or concerns through the appropriate internal reporting channels. Act Ethically: Comply with the organisation's values and avoid any actions that could contribute to exploitative practices.
Line Manager	Promote Awareness: Ensure team members understand the policy and are aware of how to identify and report concerns. Respond to Reports: Take any concerns seriously and escalate them to the People and Culture team or the appropriate authority without delay. Monitor Practices: Be alert to risks in recruitment, procurement, and operational processes that could indicate unethical practices.
People and Culture	Maintain the Policy: Keep the modern slavery policy up to date and aligned with legal and ethical standards. Provide Training and Support: Deliver awareness training and guidance to employees and managers on identifying and addressing risks. Ensure Due Diligence: Support ethical recruitment and supply chain practices, and investigate any reported concerns thoroughly and confidentially.

3. Policy Statement

We have a zero-tolerance approach to modern slavery and human trafficking. We will regularly review and update our practices to ensure ongoing compliance and continuous improvement in our efforts to combat modern slavery.

We will enhance these efforts by strengthening collaboration with suppliers through joint initiatives and advocating for stricter regulations and enforcement at the national levels. Additionally, there will be a focus on training employees across various departments to recognise and respond to signs of modern slavery, ensuring a comprehensive approach to risk management in line with safeguarding.

Signed:



Ayden Sims
AKG UK Country Manager

4. Policy

Understanding Modern Slavery

Modern slavery is a serious crime involving the exploitation of individuals through coercion, control, or deception. It includes, but is not limited to:

- Bonded labour: working to repay debts under exploitative conditions, often with restricted movement.
- Forced or compulsory labour: working under threat or coercion, often in unsafe or degrading conditions.
- Human trafficking: the movement of individuals for the purpose of exploitation.
- Criminal exploitation: being forced to commit crimes such as theft, drug trafficking, or fraud.
- Sexual exploitation: including forced prostitution and abuse for the production of explicit content.
- Domestic servitude: working in private households under coercion, often with no freedom or fair compensation.
- Other forms: including organ removal, forced marriage, and illegal adoption.

Not all poor labour practices meet the legal threshold for modern slavery. However, there remains a legal and moral obligation to address and improve such conditions wherever possible.

Compliance with the Policy

Preventing, detecting, and reporting modern slavery is a shared responsibility across all areas of operation and influence. All individuals are expected to avoid any actions that could lead to, or appear to support, a breach of this policy.

Suspected or actual breaches must be reported promptly to a line manager or the People and Culture team, or through the Whistleblowing Policy. The People and Culture team, equipped with expertise in labour law and safeguarding, will investigate all reports and liaise with relevant authorities to ensure appropriate action is taken.

Concerns should be raised at the earliest opportunity, regardless of the supplier tier or location. If there is uncertainty about whether a situation constitutes modern slavery, it should still be reported for further assessment.

Where applicable, a safeguarding incident form should be completed, clearly documenting any actions taken and identifying any third-party organisations (e.g. police, local authorities) involved in the response.

Openness is encouraged, and individuals who raise genuine concerns in good faith will be supported, even if the concerns prove unfounded. Retaliation or detrimental treatment, such as dismissal, disciplinary action, or threat, will not be tolerated. Any such treatment should be reported immediately and, if unresolved, escalated through the Grievance Procedure.

Modern Slavery Statement

Although not legally required under the Modern Slavery Act 2015, there is a firm commitment to identifying, assessing, and mitigating the risks of modern slavery across governance, operations, and supply chains.

Modern slavery encompassing slavery, servitude, forced labour, and human trafficking, is a serious crime and a violation of fundamental human rights. It involves the exploitation of individuals through coercion or control for personal or commercial gain.

A zero-tolerance stance is maintained toward all forms of modern slavery. Ethical conduct and integrity are expected in all business dealings, supported by robust systems and controls to prevent exploitation within operations and supply networks.

Commitments and Expectations

Transparency is prioritised both internally and throughout supply chains, in line with the principles of the Modern Slavery Act.

All contractors, suppliers, and business partners are expected to uphold the same high standards, including explicit prohibitions against forced, trafficked, or child labour.

These standards are embedded in contracting processes and are expected to be upheld throughout the supply chain.

Training and Awareness

Induction training includes guidance on identifying and addressing modern slavery risks.

Ongoing training is provided as needed to ensure continued awareness and vigilance across departments.

Staff are expected to remain informed and compliant with this policy at all times.

Enforcement and Accountability

Breaches of this policy may result in disciplinary action, including dismissal for misconduct or gross misconduct.

Business relationships may be terminated if individuals or organisations fail to comply with these standards.

Ongoing Action

Communication of the zero-tolerance approach is required at the outset of all business relationships and reinforced regularly.

Collaboration with suppliers will be strengthened through joint initiatives and advocacy for stronger national regulations.

A proactive approach to risk management will be maintained, with a focus on safeguarding and early identification of potential issues.

Due Diligence and Risk Management

The commitment to eradicating modern slavery extends beyond compliance is a core part of ethical business conduct. A proactive approach is taken to identify and address risks through the following measures:

- **Risk Assessment:**

Regular assessments are conducted to identify high-risk areas, particularly in regions or industries known for exploitative practices.

- **Supplier Vetting:**

All suppliers undergo a rigorous screening process. Adherence to the Supplier Code of Conduct, which prohibits forced labour, is a prerequisite for engagement.

- **Contracts and Agreements:**

All contractual arrangements include clear obligations regarding the prevention of modern slavery, along with consequences for non-compliance.

- **Training and Awareness:**

Training is provided to ensure individuals can recognise and respond to risks. Partners are encouraged to implement similar training within their organisations.

- **Monitoring and Auditing:**

Compliance is verified through a combination of self-assessments, on-site visits, and independent third-party audits.

- **Continuous Improvement:**

Ongoing improvement is central to maintaining effective due diligence. To remain responsive to emerging risks and evolving best practices, collaboration is maintained with industry experts, peers, and stakeholders. This ensures that strategies remain current, effective, and aligned with global standards.

As part of the Due Diligence, all supply chains will be required to complete **Appendix A**.

As an organisation we must:

- Put in place clear policies – preventing exploitation and human trafficking, and protecting our workforce, profits and reputation, makes good business sense.
- Be clear about our recruitment policy, for example, by requiring our recruiting managers to only use specified reputable recruitment agencies.
- Check our supply chains – the longer our supply chain the more opportunities there are for exploitation and poor practice. Tell the companies we are doing business with that we are not prepared to accept any form of exploitation.

- Check our supply chains – can we account for each step of the process? Do we know who is providing our goods and services and do we have the right mechanisms and processes in place to check?
- Lead from the top – make the appropriate checks on all employees, recruitment agencies, suppliers and subsidiaries to make sure that we know who is working for us.
- Ensure that we have in place an open and transparent grievance process for all staff including agency workers.
- Be pro-active – raise the awareness of our workforce so that they know what we are doing to promote our business and their welfare.
- Make a clear statement that we take our responsibilities to our employees and our customers seriously. We could do this by making a statement on our website or as part of our company reporting on how we are protecting our workers, by taking reasonable steps to ensure that we do not employ someone who is being exploited.

As a recruiting manager:

- Make sure that you follow company policy and only use agreed reputable recruitment agencies, specified by your People and Culture team.
- Make sure that you undertake background checks on agencies used to recruit or supply staff: Do they have a good reputation?
- Have you used them before? Do the staff they provide have the appropriate paperwork?
- Check that all staff, including agency workers, have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- Make sure staff are legally able to work in the UK. Does the recruitment agency provide assurance that the appropriate checks have been made on the person they are supplying without confiscation of workers original identification documents?
- Check the names and addresses of those working for you. If you have a number of people listing the same address it may indicate high shared occupancy, often a factor for those being exploited.
- Make sure your workers know their statutory rights including termination of employment, sick pay, holiday pay and any other benefits they may be entitled to.
- Make sure we oppose any form of forced labour, including compulsory overtime, ensuring that all employees have the right to work within reasonable hours without coercion or exploitation.
- If you suspect that someone is being exploited, seek advice.

As a front-line worker:

- Keep your eyes and ears open. If you suspect that someone is being controlled or forced by someone else to work or provide services, tell someone.
- If an unknown person appears to be monitoring the movements of a worker or appears to be controlling them in some way, tell someone. This may include the worker being collected and dropped off at work each day.

- If a colleague tells you something you think might indicate that they are being exploited or ill-treated speak to your manager or seek further advice. Talking to someone about your concerns may stop someone else from being exploited or abused.
- Often victims are physically abused. Does the person you are concerned about have any injuries which appear consistent with abuse or maltreatment? Do they appear scared or frightened?
- People may try to use business premises to traffic people. Be alert and report any suspicious activity.
- Seek advice from your manager, and challenge corporate behaviour if you think that your employer is not doing enough to prevent people from being exploited.
- If you think that a situation is not right, ask questions and report any concerns or suspicions you have.

Key Performance Indicators (KPIs)

To enhance accountability and measure the effectiveness of anti-modern slavery efforts, a set of Key Performance Indicators is used. These metrics support continuous improvement and provide a clear view of progress:

- **Supplier Compliance:** Evidence that suppliers have implemented a modern slavery policy and are actively adhering to it.
- **Incident Reporting and Resolution Rate:** The number of reported incidents compared to those resolved satisfactorily, demonstrating responsiveness and accountability.
- **Risk Mitigation Rate:** Identification of high-risk suppliers or supply chain segments, along with evidence of implemented mitigation measures.
- **Training Effectiveness:** Demonstrated completion and impact of training programmes for both internal teams and external partners on modern slavery awareness.

What should I do if I suspect someone is being trafficked?

- If you think that someone is in immediate danger, call 999.
- The Metropolitan Police with Stop the Traffick have a 24-hour hotline for victims to call or to report suspected trafficking. The number is 0800 783 2589.
- For England and Wales, please call The Salvation Army 24-hour confidential Referral Helpline on 0300 3038151 anytime of the day or night to refer a potential adult victim of trafficking or to receive advice.
- For potential child victims of trafficking please call your Local Authority Children's Services or the NSPCC Child Trafficking Advice Centre on 0808 800 5000.
- Northern Ireland and Scotland:
    - Migrant Help - 07766 668781
    - Scotland: TARA - 0141 276 7724
- Complete the relevant safeguarding forms for notification to AKG UK and the local authority.

Not all victims may want to be rescued and there may be instances where reporting a suspected trafficking case puts the potential victim at risk.

For further guidance, please visit the Home Office Practical Guidance here

5. Contact

For more information about this policy or to raise any suggestions or concerns, please contact peopleandculture@akguk.co.uk

Appendix A – Supplier Due Diligence

To be completed as part of Due Diligence for all our supply chain associated with AKG UK.

Supplier name	
Person completing form	
Date of completion	
Review date (annual review)	

Section 1: Risk Assessment

1. **Geographic Risk:**
   Indicate the countries involved in the supply chain. Highlight any countries known for high risks of modern slavery or human trafficking.

2. **Product/Service Risk:**
   Assess the risk level associated with the specific products or services provided by the supplier. Consider industries with historically higher risks.

3. **Supplier Workforce:**
   - Estimate the size of the supplier's workforce.
   - Evaluate the demographic composition, including the presence of vulnerable groups.

Section 2: Compliance with Anti-Modern Slavery Policies

1. **Confirmation of Policy Awareness:**
   - Confirm that the supplier is aware of your company's anti-modern slavery policy.
   - Provide evidence of the supplier's commitment to implementing and complying with your policy.

2. **Supplier's Own Policies:**
   Information on the supplier's internal policies and measures to combat modern slavery.

3. **Training and Awareness:**
   Confirm that the supplier provides training to its employees regarding modern slavery awareness and prevention.

Yes ☐ No ☐

Section 3: Auditing and Monitoring

1. **Previous Audits:**
   - Provide details of any previous audits conducted on the supplier regarding modern slavery.
   - Include results and actions taken in response to audit findings.

2. **Monitoring Mechanisms:**
   - Describe the supplier's mechanisms for monitoring and ensuring compliance with anti-modern slavery measures.

Section 4: Reporting and Whistleblower Mechanisms

1. **Reporting Mechanisms:**
   - Confirm the existence of mechanisms for reporting modern slavery concerns within the supplier's organisation.

2. **Incident Response:**
   - Provide details on the supplier's response procedures in case of reported incidents related to modern slavery.

Section 5: Continuous Improvement

1. **Improvement Initiatives:**
   - Confirm any ongoing or planned initiatives by the supplier to improve its anti-modern slavery measures.

2. **Feedback and Collaboration:**
   - Please provide feedback on your company's efforts and suggest collaborative activities to enhance anti-modern slavery initiatives.

Section 6: Additional Comments/Attachments

1. **Additional Information:**

Annex 1: AKG Values Matrix

Purpose of the AKG Values Matrix

AKG UK is committed to ensuring everything we do and every decision we make is aligned to our core values. This short matrix ensures that all our policies are developed to align with and support our core values.

Policy	Modern Slavery Policy
Matrix completed by:	Alpa Gohil
Date of assessment:	01 December 2025

Assessment

AKG UK Value	Summary of how the policy aligns to and supports our values.
Empowerment	The policy empowers employees, suppliers, and stakeholders to take a stand against modern slavery and human trafficking. It provides guidance, training, and reporting mechanisms, ensuring that everyone has the confidence and tools to act against unethical practices.
Empathy	By prioritising ethical treatment of workers and ensuring fair labour practices, the policy reflects our commitment to human dignity. It fosters a culture of care and concern for vulnerable individuals who may be at risk of exploitation.
Integrity	The policy upholds our commitment to doing business ethically, ensuring transparency in our supply chains and zero tolerance for forced labour. It reinforces our responsibility to act honestly and in compliance with legal and moral standards.
Connected	The policy strengthens our relationships with employees, partners, and suppliers by fostering a shared commitment to human rights. It promotes collaboration and accountability across our networks to create a responsible and ethical business environment.

Annex 2: Equality Impact Assessment

AKG is committed to promoting the equality of opportunity for all our staff and service users, and for ensuring our staff and beneficiaries do not feel discriminated against, harassed or victimised by our working practices, whether or not they share a protected characteristic. Allowances can and will be made wherever reasonable and practicable to any of the rules and conditions outlined within this policy if it is determined that any individual or group is negatively impacted by one or more of the rules and conditions outlined in it.

If you feel this policy is discriminatory in any way, or that your personal circumstances are such that adjustments to the conditions of the policy are required for you, then you are encouraged to speak with your line manager at the earliest opportunity, or to contact the policy owner. Any issues raised will be treated without prejudice and with the strictest confidence.

Purpose of an Equality Impact Assessment

An Equality Impact Assessment is a tool for identifying whether strategies, projects, services, guidance documents, working practices or policies have an adverse or positive impact on a particular group of people or equality group so that any necessary adjustments can be made to mitigate those adverse impacts, or to further promote those positive impacts.

While only public bodies are legally required to complete Equality Impact Assessments, AKG UK has adopted the process in line with our own commitment to equality and diversity and as part of our continual improvement efforts.

Policy in scope	Modern Slavery Policy
Completed by:	Alpa Gohil
Date of assessment:	01 December 2025

Assessment

Equality Area	Positive	Neutral	Negative	Summary
Age	☐	☒	☐	The policy applies equally to all members of staff regardless of age. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their age.
Disability	☐	☒	☐	The policy applies equally to all members of staff regardless of health/disability. It's not considered that the policy includes any guidance or rules that

				may impact either positively or negatively on any member of staff because of their disability.
Pregnancy or maternity / paternity	☐	☒	☐	It's not considered that the policy positive or negatively impacts on pregnant women or on staff on maternity or paternity leave.
Race and ethnicity	☐	☒	☐	The policy applies equally to all members of staff regardless of their race, origin, colour or nationality. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.
Gender	☐	☒	☐	The policy applies equally to all members of staff regardless of their gender at any given time. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of gender.
Sexual orientation	☐	☒	☐	The policy applies equally to all members of staff regardless of their sexual orientation. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because their sexual orientation.

Negative Impacts and mitigations

Negative Impact	Mitigation	Owner
None		