

## **Modern Slavery Statement**

### **Anti-Slavery and Human Trafficking Statement**

### **Organisational Structure and Supply Chains**

Acolad is a global leader in content and language solutions, delivering translation, localisation, interpreting, and content management services to a diverse client base across industries such as life sciences, legal, financial services, manufacturing, and technology. With a presence in multiple countries, Acolad employs a vast network of language professionals, project managers, and technical experts, supported by an extensive supply chain of freelance linguists, technology providers, and service partners.

Given the international scope of our operations, we recognise that certain regions and supplier categories may present higher risks related to modern slavery and human trafficking. As a result, we prioritise rigorous due diligence in our vendor selection and ongoing supplier assessments, particularly in regions where labour rights may be more vulnerable. While we acknowledge the complexities of managing a global supply chain, we have implemented strict policies and safeguards to mitigate risks and uphold ethical and responsible business practices.

### **Our Policy on Modern Slavery and Human Trafficking**

We maintain a strict zero-tolerance approach to modern slavery and human trafficking. Our commitment is to ensure that neither our business operations nor our supply chains involve any form of forced labour or exploitation. We uphold high ethical standards and implement rigorous systems to prevent and detect slavery and human trafficking in all aspects of our business relationships.

We acknowledge that modern slavery, as defined by the International Labour Organisation (ILO), includes:

1. Forced labour under threat of physical or psychological harm.
2. Control by an employer through coercion, abuse, or threats.
3. Debt bondage, where workers are forced to work to repay loans without proper remuneration.
4. Unlawful withholding of wages or excessive deductions contrary to prior agreements.
5. Dehumanisation of individuals, treating them as commodities or property.
6. Physical confinement or movement restrictions imposed on workers.

In accordance with relevant legislation and ethical guidelines, we commit to:

- **Freedom to Terminate Employment** – Ensuring employees can resign freely without penalty.
- **Freedom of Association** – Supporting workers' rights to unionise and engage in collective bargaining.
- **Prohibition of Violence and Intimidation** – Preventing any form of coercion, threats, or abuse in the workplace.
- **No Worker-Paid Recruitment Fees** – Prohibiting recruitment practices that result in debt bondage.
- **Prohibition of Child Labour** – Upholding strict policies against child labour in our operations and supply chain.
- **Non-Discrimination** – Ensuring an inclusive workplace free from discrimination based on protected characteristics.
- **Retention of Personal Documents** – Allowing employees to retain their identification and personal belongings.

- **Access to Remedy** – Providing grievance mechanisms for workers to report concerns confidentially and without fear of retaliation.

### Commitment

1. We recognise our responsibilities under the **Modern Slavery Act 2015** and are committed to ensuring that modern slavery and human trafficking have no place in our business or supply chains. We continuously assess and improve our due diligence processes to identify, prevent, and address risks of exploitation.
2. We align our approach with **ILO standards**, recognising modern slavery as a severe violation of human rights. Our policies and procedures integrate the principles of ethical employment and fair treatment.
3. We strictly comply with all **applicable labour, human rights, and anti-discrimination laws** to ensure safe and ethical working conditions across all levels of our organisation.
4. We maintain a **zero-tolerance approach** and will cease any business relationship with an entity found to be complicit in slavery, servitude, or forced labour.
5. We strive to ensure that all labour associated with our business operations is ethically sourced and adheres to all relevant employment legislation.

### Supplier Due Diligence & Auditing Processes

We conduct risk-based audits of high-risk suppliers to ensure compliance, either through internal reviews or third-party verifications. If a supplier is found to have modern slavery risks, a corrective action plan will be implemented with a defined timeline for resolution. Continued non-compliance may result in termination of the business relationship.

To uphold our commitment to preventing modern slavery, we have implemented the following due diligence measures:

- **Risk Assessments** – Identifying high-risk areas within our operations and supply chains.
- **Supplier Engagement** – Requiring suppliers, subcontractors, and agencies to acknowledge and adhere to our modern slavery policy.
- **Supplier Surveys** – Assessing suppliers' compliance with anti-slavery policies and practices.
- **Contractual Safeguards** – Including anti-slavery provisions in supplier contracts where applicable.
- **Termination of Non-Compliant Suppliers** – Ceasing business relationships with any entity found to violate our ethical standards.

### Whistleblowing & Reporting Mechanism

To facilitate compliance, we maintain an updated supplier database with key contacts and encourage all employees, suppliers, and third parties to report any suspicions of modern slavery via our confidential whistleblowing dedicated email. Reports can be made anonymously, and we enforce a strict zero-retaliation policy to protect whistleblowers.

### Effectiveness in Combating Slavery and Human Trafficking

Given our **zero-tolerance stance**, we do not rely on quantitative key performance indicators (KPIs) to measure compliance, as any instance of modern slavery would constitute an unacceptable breach. However, we monitor adherence through:

1. Supplier confirmations regarding compliance with our modern slavery policy.
2. Implementation of anti-slavery policies and procedures by our suppliers.
3. Supplier obligations requiring their employees to adhere to modern slavery prevention measures.

For suppliers without modern slavery policies, we request timelines for implementation and offer guidance where necessary.

### Internal Governance & Responsibility for Our Policy

Our Compliance Team, in collaboration with Procurement and HR, is responsible for monitoring and enforcing this policy. Any reported concerns will be thoroughly investigated, with findings escalated to senior leadership as needed. Any queries or concerns regarding modern slavery should be directed to the Compliance Team, who will conduct an annual review to assess and enhance our anti-slavery measures.

The Compliance Team will conduct an annual review of our obligations and initiatives to combat modern slavery within our organisation and supply chain. This review will assess the effectiveness of our measures, integrate regulatory updates, and strengthen our approach to prevention and risk mitigation.

### Training and Awareness

All employees will undergo mandatory annual training on modern slavery risks, focusing on identifying red flags, reporting concerns, and ensuring ethical supply chain management. Procurement and supplier management teams will receive specialised training on assessing and mitigating supplier risks.

This policy is widely communicated within the organisation and forms part of our **employee induction programme**. Additionally, all personnel responsible for compliance, procurement, and supplier management receive **specialised training** on recognising and mitigating modern slavery risks.

### Review and Future Steps

We recognise that combating modern slavery is an ongoing commitment requiring continuous improvement. We will regularly evaluate our processes to ensure compliance with evolving regulations and best practices. Based on our annual policy review, we intend to:

- Enhance **supplier engagement** by promoting awareness and best practices.
- Strengthen **internal training programmes** to improve understanding of modern slavery risks.
- Improve **grievance mechanisms** to ensure workers can report concerns safely and confidentially.

This statement pertains to the **2025 financial year** and has been approved by the Board.

**Signed:**  
**Bertrand Gstalder**  
**Chief Executive Officer**  
**Acolad**

Signé par :  
  
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