

# **Modern Slavery and Human Trafficking Statement 2025**

**Academia Ltd**

## **Modern Slavery and Human Trafficking Statement 2025**

### **Overview**

This statement applies to Academia Ltd (referred to in this statement as “the Organisation”). The information included in the statement refers to the financial year ending 30th June 2024.

Academia Group, including its associated and subsidiary companies, recognises that it has a responsibility under the Modern Slavery Act 2015 to take a robust approach to slavery and human trafficking and we are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

### **What is Modern Slavery**

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

### **Our Commitment**

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

### **Our Organisational structure and Supply Chains**

We are a UK-based provider of technology services for education, public services and the private sector, providing IT solutions and services UK-wide. Headquartered in Hertfordshire with our supply chains based within the UK.

Due to the nature of our services, our business operations are predominantly in the technical arena. We provide services to a range of public sector organisations and education such as Schools and Colleges, Universities, NHS as well as to the private sector.

## Our Policies

HR Policies – We promote our Modern Slavery Policy within our people Team HUB which is available to all colleagues and is provided upon commencement of employment. We have zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally and are paid above the national minimum wage. Our employees won't be forced to work in excess of the number of hours permitted in law, and normal working hours won't exceed 48 hours per week average unless the employee agrees.

Purchasing Policy – The company is committed to conducting purchasing activities in a fair, objective and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to our 'Code of Ethics', 'Anti-Bribery' and 'Modern Slavery and Human Trafficking' policies which fulfil legal and financial obligations and effectively manage commercial risk. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable environmental, sustainable, business integrity along with Corporate Social Responsible (CSR) standards including but not limited to compliance with laws and regulations, respect for human rights, working conditions, equal opportunities, maintenance and promotion of information security, fair trade and acceptable corporate ethics.

Recruitment Policy – We use specified and reputable employment agencies to source workers, we verify the practices of all agencies prior to commencing any working relationship. We also ensure that all employees have the right to work in the UK.

Whistleblowing Policy – We encourage all our employees and business partners to report any concerns related to direct activities or the supply chain of the Academia Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

## Our Core Values – TIAC

Academia's core values make it clear to our employees the actions and behaviours expected of them when representing the Academia Group. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

 <p><b>Teamwork</b></p> <p>We value each member of our team and encourage honesty.</p>	 <p><b>Innovation</b></p> <p>We listen to our customers and provide the most innovative solutions.</p>	 <p><b>Integrity</b></p> <p>We build relationships with our customers based on mutual trust and honesty.</p>	 <p><b>Ambition</b></p> <p>We strive to be leaders in all we do and refuse to compromise on quality.</p>	 <p><b>Customer</b></p> <p>We support our customers and provide the best service of all time.</p>
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## **Training / Raising Awareness**

The organisation has raised awareness of modern slavery issues by circulating information to employees. The information explained to relevant employees:

- The principles of the Modern Slavery Act 2015 and how it applies to Academia;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

## **Addressing the Risks**

Due to the nature of the supply chain, Modern Slavery risks are inherently higher in the hardware and peripheral item category, as the production process relies on factory labour. Additional steps to manage the risk include sourcing goods from recognisable brands and reputable resellers, with evidenced processes and policies in place along with products/suppliers that are assessed based on the country of origin.

Countries and regions are assessed for risk based on the Global Slavery Index, taking into consideration the latest updates from The Department for International Trade.

## **Steps and Due Diligence Processes**

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- When a supplier is deemed to be higher risk by country of origin and/or lack of suitable policy/processes, an investigation is raised and assessed by senior members of the purchasing team which can result in the vendor being inactivated.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including

This statement is made in relation to Section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 30th June 2024.

This Modern Slavery Statement has been approved on behalf of Academia Ltd and its associated and subsidiary companies by the Board on 24th March 2025.



**Mark McCormack, Managing Director**

Academia Ltd

24th March 2025

## Tracking Our Progress in 2024

Key areas	What have we done?
<b>Policies</b>	<p>We have reviewed all our HR Policies associated with the Modern Slavery Policy including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Anti-bullying</li> <li>• Harassment</li> <li>• Discrimination</li> </ul>
<b>Suppliers</b>	<p>We have strengthened our due diligence by developing a Self-Assessment Questionnaire (SAQ) for Suppliers. This ensures all suppliers engaging with Academia are maintaining minimum standards and expectations in areas such as commercial, quality, health and safety, environmental responsibility, ethics and compliance with laws and regulations, as well as practicing good information security and have appropriate controls in place to mitigate risks.</p> <p>The questionnaire has been developed to protect Academia's data, assets and reputation. This also ensures that all our suppliers, both new and existing go through a consistent Information Security and compliance due diligence process.</p> <p>Our top 12 suppliers have been sent a copy of the SAQ, with 4 suppliers having completed and returned their responses.</p> <p>Responses have been reviewed along with supporting documentation and the supplier sent details of the results in the form of a Supplier Certificate.</p>
<b>Awareness</b>	<p>We have shared material with staff, which raise awareness of modern slavery including how to spot the signs of various types of slavery and exploitation, as well as how to find out more information and report slavery in the form of:</p> <ul style="list-style-type: none"> <li>• Posters - made available on notice boards and via the Staff Hub</li> <li>• A briefing document has been shared with staff via the Staff Hub</li> <li>• Wallet cards highlight the signs and are available from the front desk.</li> </ul>

## Our Focus for 2025

Key areas	Proposed target
<p><b>Policies</b></p>	<p>Develop a strategy plan for Corporate Social Responsibility, which references where we currently stand on our:</p> <ul style="list-style-type: none"> <li>• Core Values</li> <li>• Code of Conduct for Employees</li> <li>• Anti-bribery</li> <li>• Social Value</li> <li>• Equality, Diversity and Inclusion</li> <li>• Health and Wellbeing</li> <li>• Sustainability</li> <li>• Modern Slavery</li> <li>• Carbon Reduction</li> <li>• Gender Pay Gap</li> </ul>
<p><b>Suppliers</b></p>	<p>We will strengthen our due diligence and supplier management by creating and cascading a Supplier Code of Conduct to all key existing suppliers on what modern slavery is, what it means to Academia and what our expectations are of our suppliers.</p>
<p><b>Training/ Awareness</b></p>	<p>We will provide practical training and e-learning on Modern Slavery, which will be rolled out to all colleagues across the organisation.</p> <p>Our leading KPI for anti-slavery performance is training completion for all colleagues and detailed training on Modern Slavery for higher risk roles,</p> <p><u>Anti-Slavery Day – 18th October 2025</u> As part of our ongoing commitment a programme of events will be organised around raising awareness and sharing information which shine a light on the issues of modern slavery.</p>