



## Statement on Modern Slavery 2023

### Our Business

Accolite Digital is a professional services company that strives to help its clients simplify their digital journey. The Group is headquartered in Texas (US), with a global headcount above 3,000.

Accolite Labs Europe Ltd (“Accolite”) is the primary contracting entity for Accolite’s UK business and it often utilises the services of other group companies across the globe.

Modern slavery is the illegal exploitation of people for personal or commercial gain and encompasses slavery, servitude, human trafficking and forced labour. Accolite has a zero-tolerance approach to any form of modern slavery – whether in its operations or those of its suppliers -- and is committed to ensuring effective systems and restrictions are in place to protect against it.

### Risk Considerations

Accolite is fundamentally a “people business” and we are an equal opportunity employer. Accolite provides IT and consulting services to clients in various business sectors. Accolite does not manufacture any tangible products, nor do we usually directly procure products for clients.

Since IT consulting and professional services is a highly competitive industry, we need to attract and retain top talent while building a diverse, inclusive workforce that delivers exceptional client service. Considering the nature of the industry in which we operate, we feel the risk of indentured or bonded labour being used within our sphere of influence is lower than in some other industries. Accolite nonetheless implements various measures to ensure mitigation of any such risk.

### Policies and Practices

Accolite believes in acting ethically throughout our business. In December 2022, we updated our [Code of Conduct & Ethics](#) (the “Code”) to reaffirm our core values and emphasize the standards of conduct that we expect from our personnel. The Code is publicly available and applies to all Accolite personnel worldwide (collectively “Associates”). Accolite is also implementing updated mandatory training on the Code, which will be required to be completed by Associates at all levels on an annual basis. The Code highlights the company focus on respecting people and promoting a culture of ethics and compliance.

Specifically in relation to labor practices, we uphold human rights in all our global operations. All Accolite Associates worldwide are entitled to fair wages and hours, consistent with local laws, and are entitled to work in an environment free from discrimination. Our company does not make use of child labor (i.e., a person under the minimum age provisions of applicable laws and regulations) or forced labor (i.e., prison labor, indentured labor, bonded labor, military labor, slave labor), does not condone any form of human trafficking, and will not work with third parties who engage in such practices.

Our Associates or Third Parties can report suspected violations of any of these policies/standards to Accolite’s HR, Compliance and Legal teams. All reports are taken seriously and investigated by the company. If any deficiencies in compliance were to be uncovered, remediation plans may be devised to address the deficiencies, but failure to comply may also result in termination of the relationship.

### Supply Chain Management



Accolite extends its commitment to address modern slavery to how it thinks about its supply chain. Our supply chain management policies includes a [Supplier Code of Conduct](#), which is available on our website and sets out the principles by which all of Accolite's third-party representatives, suppliers, vendors, and subcontractors and their parent, subsidiary, and affiliated entities are expected to abide.

### Training

As part of Accolite's ethics and compliance training program, all new employees hired into Accolite are required to undergo mandatory training in relation to the Code. Further to increase awareness of human trafficking and modern slavery risks, Accolite provides refreshers, to its associates, with an expectation that all associates will follow applicable laws and report concerns of illegal or unethical activity.

### Next steps

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking, ensuring our new and existing measures support our zero-tolerance stance to modern slavery.

This statement relates to our financial year that ended on 31 December 2022 and is made in accordance with the UK Modern Slavery Act 2015. It applies to Accolite Digital Group, Inc. and all its subsidiaries.

### Signed by:

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Ketan Somani, Director

Accolite Labs Europe Limited

10/12/2023

Incorporated under the laws of England and Wales and registered at Companies House under number 10711071 20-22 Wenlock Road, London, N1 7GU