

MODERN SLAVERY STATEMENT FOR ACUMEN SOLUTIONS GROUP

FINANCIAL YEAR ENDING 31 DECEMBER 2020

INTRODUCTION

Acumen Solutions is committed to improving its practices to ensure slavery and human trafficking are not taking place in any part of the business or our supply chain and this statement sets out the steps we have taken during the current financial year. We expect the same commitment from our suppliers, contractors and business partners.

ORGANISATIONAL STRUCTURE

Acumen Solutions focuses on pragmatic and high-impact strategies, roadmaps for achieving success, and change and transformation for our clientele. We are at the forefront of delivering transformative cloud-computing solutions for our customers and have performed many large, complex implementations. Currently, we employ over a thousand people in our 9 locations in the UK, US, and Canada.

This statement applies to every company within the Acumen Solutions Group, comprising Acumen Solutions, Inc. and its subsidiaries, Acumen Solutions UK Ltd. and Acumen Solutions Consulting Canada Inc.

OUR SUPPLY CHAINS

Our key supply chains comprise:

- Computer software and equipment
- Cloud-based service providers
- Third party contractors providing consulting personnel
- Office supplies

In light of the above, Acumen Solutions considers that the risk of modern slavery within our business and supply chain is low.

OUR APPROACH TO SLAVERY AND HUMAN TRAFFICKING

Acumen Solutions is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all of our business relationships. We promote and implement effective systems to ensure slavery and human trafficking is not taking place anywhere in the business or our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of Acumen Solutions' supplier due diligence processes into slavery and human trafficking, our supplier approval (and renewal) process incorporates a review of the controls undertaken by the supplier in relation to slavery and human trafficking according to the level of

risk for each supplier. We will not support or deal with any business knowingly involved in slavery or human trafficking.

Acumen Solution has in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Protect whistleblowers.

SUPPLIER ADHERENCE TO CORE VALUES

Acumen Solutions has zero tolerance to slavery and human trafficking.

To ensure all those in our supply chain and contractors comply with our core values including *our people matter* and *act with honesty and integrity*, we have in place a supply chain compliance programme. This consists of:

- carrying out the due diligence as referred to above as to the potential level of risk of slavery and human trafficking for any new suppliers; and
- requiring our suppliers to commit in writing to comply with our Modern Slavery Statement as part of their standard terms and conditions, to have in place their own modern slavery statement if they are required to do so and to commit to not use or permit to be used any slavery or child labour in the fulfilment of any supply of goods or services.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Acumen Solutions:

- regularly circulates and shares our Modern Slavery Statement with suppliers to promote awareness of these risks and to acknowledge our commitment to the legislation; and
- has training, ethics, disciplinary and whistleblowing policies and procedures in place for staff which we believe are sufficient to allow and encourage staff to raise any concerns and for Acumen Solutions to take appropriate corrective action if necessary.

FURTHER STEPS

Acumen Solutions has not received, to date, any reports or concerns regarding slavery and human trafficking within our supply chains or business. In the future, we will continue to do the following to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Policies and Procedures:** Regularly review the effectiveness of the relevant policies and procedures that we have in place to make ensure we have are following best practices to ensure slavery and human trafficking are not taking place within our business and supply chains.

- **Training:** Provide training to key personnel in the business on the risks of Modern Slavery and how to address it.
- **Supply Chain Audit:** Continue to require our suppliers to complete the Modern Slavery Act 2015 Declaration to eliminate risks of Modern Slavery in our supply chains.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Acumen Solutions' slavery and human trafficking statement for the financial year ending December 2020.



David Joubran, President and CEO

Acumen Solutions Group