

## Modern Slavery policy

The Association of Certified Digital Accounting Professionals (ACDAP) is firmly dedicated to modern slavery and human trafficking having no place in our practices or supply chains.

This policy documents the measures on the way to detect, prevent, and react to any forms of slavery and human trafficking taking place within our institution and among our partners and suppliers, in full conformity with the UK legal framework, including the Modern Slavery Act 2015.

### Our commitment

ACDAP holds human rights in high regard and, as such, conducts business with the best ethical standards. We support the Modern Slavery Act 2015 very strongly.

We are completely committed to setting up proper systems and controls within our organisation to ensure modern slavery and human trafficking are not taking place within our organisation or in our supply chain.

This commitment supports our conduct as bound by the legislation. It includes the Human Rights Act 1998 and the Equality Act 2010 to ensure our practices support a fair, just, and ethical business environment.

### Scope

This policy applies to all individuals working for or on behalf of ACDAP, including employees, contractors, suppliers, partners, and other stakeholders. This calls for each and every individual within the organisation to be alert and report any suspicion pertaining to modern slavery and human trafficking.

We recognise our responsibility under Section 54 of the Modern Slavery Act 2015 to ensure our business operations and the supply chains through which we procure our goods and services are free from the taint or risk of slavery and human trafficking.

### Risk assessment and due diligence

ACDAP undertakes an annual risk assessment for the purpose of identifying and assessing potential risks of modern slavery within our operations. Our approach encompasses the following practices:

- Conducting full due diligence on suppliers and partners in terms of alignment with our ethical standards, in line with the UK Bribery Act 2010.
- Insertion of anti-slavery clauses into contracts and agreements with suppliers and partners to ensure that they fully conform to the Modern Slavery Act 2015 and connected laws.
- Monitoring and auditing our supply chains for compliance with our modern slavery policies and standards outlined by the Ethical Trading Initiative (ETI) Base Code.

### Training and awareness

We are committed to providing training and raising awareness of modern slavery and human trafficking among our staff and business partners. Under the Employment Rights Act 1996, we train

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our staff on an ongoing basis to raise awareness of the signs of modern slavery, its implications, and how to react to suspicion or concern.

Such training ensures the rights and duties of personnel and puts them in a position to exercise their best judgment in doing what is right for those at risk.

### Reporting and whistleblowing

ACDAP embraces the culture of openness and transparency. We have developed a whistleblowing policy in line with the Public Interest Disclosure Act 1998 that enables all employees or other stakeholders to report, in confidence and without fear of reprisal, any instances relating to modern slavery or human trafficking.

We will ensure that all reports are investigated and appropriate action taken subject to any findings, which will ensure compliance with our legal obligations.

### Continual improvement

We acknowledge the fight against modern-day slavery to be persistent and needs great vigilance. Accordingly, ACDAP has been devoted to the continuous improvement of its policy, procedures, and practices to be effective in deterring the risks of modern slavery.

We shall continue to review and update this policy in line with any changes to legislation, industry best practice, and the changing nature of modern slavery to ensure compliance with all applicable UK laws and international conventions.

### Policy review

We will review this policy annually, or as and when needed, for its effectiveness and relevance. All major changes will be communicated to all interested parties, and any important changes to the policy will be made to ensure that our approach is in line with any changes in the law, as well as best practices in the UK and internationally.



**Salman Khan**  
Chief Executive Officer