



## Anti-Slavery and Human Trafficking Policy Statement

*This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Actavo Group Limited and other relevant group companies (“Actavo”) during the year ending 31<sup>st</sup> December 2025 to prevent modern slavery and human trafficking in its business and supply chains.*

### Anti-Slavery and Human Trafficking Statement

#### **1. Introduction**

Actavo is committed to ensuring that our business is carried out in compliance with relevant laws and we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited.

We strive to ensure that neither modern slavery nor human trafficking supports our supply chain or our businesses; this objective is implicit in our policies and procedures. We aim for a zero-tolerance approach to violations of anti-slavery and human trafficking laws. Actavo is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

#### **2. Organisation Structure**

This statement covers the activities of Actavo Group Limited, which is a global business headquartered in Ireland, with a number of subsidiaries, some of which operate in the UK. Actavo operates across a variety of business areas, full details of which are available on its website.

#### **3. Relevant Policies**

Actavo operates several policies which mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations:

- Actavo Staff Handbooks
- Actavo Whistleblowing Policy
- Actavo Anti-Bribery and Corruption Policy.

These policies and documents will continue to be reviewed on an annual basis.

#### **4. Whistleblowing**

The Actavo Whistleblowing Policy is highlighted to employees on a regular basis. Actavo encourages all its workers to raise concerns or disclose information which relates to wrongdoing, illegal practices or unethical conduct, which may come to their attention through work. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. Actavo’s whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Employees who have concerns can use our confidential helpline/raise them confidentially via our dedicated email address.

#### **5. Supply Chain Management**

Actavo does not operate in sectors which have historically been associated with the risk of slavery or forced labour.

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The employees responsible for managing suppliers and others involved with Actavo are themselves responsible for ensuring that Actavo's corporate policies are upheld throughout our supply chain. This continues to be a work in progress, and we continue to strengthen our controls as new contracts are agreed.

In 2023, the Company developed a Supplier Code of Conduct, to which all suppliers are asked to adhere, if they do not already have their own standards in place which meet or exceed the Code. The Code includes anti-Modern Slavery provisions and non-adherence will be considered to be a material breach of contract by the supplier.

It is our policy not to continue business with individuals and organisations found to be involved in slavery, human trafficking, forced or child labour and we will cease business with individuals and organisations who are found to be in breach of the relevant legislation.

### **6. Recruitment and Selection**

All Actavo entities have controls in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports where appropriate.

Actavo and its associated subsidiaries do not employ individuals who would be considered to be 'child workers'. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

Basic rights which we expect all workers to enjoy including:

- The right to a reasonable wage
- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our whistleblowing policy free of charge, if the worker believes that they are not being fairly treated or have any other concerns.

### **7. Corporate social responsibility policy/charitable foundation**

Over the last decade Actavo's charitable activities have supported organizations that strengthen the communities in which we live and work, in Ireland, the UK and internationally. The extent of these endeavors has grown with our business's expansion.

### **8. Right of Audit**

All offices in the Company are subject to periodic audits. Core audit work includes an assessment of compliance with Actavo's internal policies and all relevant laws.

### **9. Learning**

We want to help our employees, suppliers, and partners to understand more about these issues and understand how to report any suspicions they may have related to modern slavery and human trafficking. We are continuing to develop training on the issues of slavery and human trafficking and information on Actavo's Anti-Slavery and Human Trafficking Statement will be delivered to our employees and partners on a periodic basis. All relevant staff will be required to attend training in this area to better understand the risks. In 2024 we automated the training process. We are planning to upgrade our training system in 2026.

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### **10. Our Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### **11. Looking Forward**

Actavo will continue to develop the measures mentioned above and our approach to the prevention of modern slavery and human trafficking will continue to evolve.

This statement is made pursuant to section 54(1) of the U.K. Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for all Actavo group companies for the financial year 2025.

A handwritten signature in black ink, appearing to be 'K. T.' followed by a flourish.

Actavo Group Limited

Director

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