



MODERN SLAVERY POLICY

Date Last Reviewed	December 2025
Date Effective From	6th January 2026
Date of Next Planned Review	December 2026
Signed	Natalie King, Managing Director

Rationale:

1. This policy and statement sets out AccXel's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed to ensure that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the calendar year of January 2026 to December 2026.

Policy Statement:

2. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The College has a zero-tolerance approach to modern slavery; we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

3. We are committed to ensuring there is transparency in our own business practices and in our approach to tackling modern slavery throughout the supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.
4. This policy applies to all persons working for AccXel in any capacity, including employees at all levels, agency workers, seconded workers, volunteers, contractors, external consultants, third-party representatives and business partners.
5. To protect those raising the issue of slavery and human trafficking within the organisation please refer to the AccXel Whistleblowing Policy.
6. Management at all levels of the College are responsible for ensuring those reporting to them understand and comply with this policy and are given appropriate and regular training.

Organisational Structure:

7. The College employs 18 staff and caters for more than 250 part-time students.

General Principles:

8. Employees and our partners are expected to understand and comply with this policy.
9. AccXel identifies the following as the principal areas of potential risk:
 - a. Supply chains
 - b. Outsourced activities
10. In its supply chains, AccXel has identified the following business areas as carrying material risks of modern slavery occurring:
 - a. Cleaning Services
 - b. Security and Maintenance Services
 - c. Information and Technology

- d. Training and Development procured
- e. Supply of clothing i.e. workwear
- f. Work based Learning

11. When procuring any types of goods or services, AccXel requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.
12. Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or AccXel's own policies and procedures, will be removed from the College's list of suppliers and will not be considered for future supply to the College unless they can demonstrate that these compliance requirements are met.
13. Compliance with the Policy The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
14. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
15. You must notify your line manager as soon as possible
16. If you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
17. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest opportunity.
18. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager OR report it in accordance with our Whistleblowing policy as soon as possible.
19. Where appropriate and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

20. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise this with your line manager or through a member of the Senior Management team.
21. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Due Diligence:

22. AccXel undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers.
23. AccXel's due diligence and reviews include: 1
- a. Evaluating the modern slavery and human trafficking risks of each new supplier
 - b. Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
 - c. Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.
 - d. 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 termination of the business relationship.

Actions:

24. AccXel will distribute the Modern Slavery Policy and Statement to all active suppliers and ask they read and confirm that Modern Slavery is not occurring in their business or supply chain.

25. All prospective suppliers will be asked to read and confirm that Modern Slavery is not occurring in their business or supply chain as part of AccXel's process of setting up new suppliers.
26. AccXel will carry out briefings and training to managers involved in the purchase of goods and services to ensure they understand the principles of this document.

Performance Indicators:

In the period January 2025 to December 2025 there were no instances of modern slavery concerns being reported to AccXel.

Review of Policy:

The Modern Slavery Policy will be reviewed in line with future legislative changes, case law or at no later than December 2026.

Signed:

Natalie King

Date: 06/01/2026