



Modern Slavery Policy

Date: 12-Jan-2026

1. Modern slavery statement

Acumen is dedicated to upholding the highest standards in all aspects of our operations. This commitment includes actively combating modern slavery and human trafficking in accordance with applicable United Kingdom and EU regulations.

Modern slavery encompasses practices such as slavery, servitude, forced or compulsory labour, and human trafficking. These practices represent serious violations of fundamental human rights and involve the deprivation of an individual's liberty by another person for the purpose of exploitation, whether for personal or commercial gain. Acumen is committed to ensuring that such practices have no place within our business or supply chains. We maintain a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We implement and enforce effective systems and controls designed to prevent modern slavery from occurring within our own operations or throughout our supply chain. Acumen is also committed to maintaining transparency in our business practices and in our approach to identifying and addressing modern slavery risks. We expect the same high standards from all of our contractors, suppliers, and business partners, and we work collaboratively to promote ethical and responsible business practices.

1. General provisions

1.1 Slavery, forced labour, servitude, and human trafficking are criminal activities that deprives individuals of their liberty and financial or other forms exploitation.

2.2 We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to preventing all forms of Modern Slavery within our operations and throughout our supply chains.

2.3 This policy applies to all individuals working for or on behalf of the Company in any capacity, including employees, directors, officers, workers, consultants, contractors, volunteers, suppliers, and service providers. All such individuals are required to read and comply with this policy.

2.4 Failure to comply with this policy may result in disciplinary action, including dismissal for employees or termination of the contractual relationship with contractors, suppliers, or other business partners.

2.5 If you are an employee, this policy does not form part of your employment contract, and we may update it at any time.

2. Preventing Modern Slavery

2.1 We carry out appropriate due diligence checks on all employees, recruitment agencies, and suppliers to ensure we know who is working for us or on our behalf.

2.2 We ensure that all employees are paid in accordance with applicable laws and receive remuneration that is not less than the legally established minimum wage.

2.3 We comply with all legal obligations relating to the health and safety of our employees and workers, including requirements concerning working hours, rest breaks, and annual leave.

3. Recruitment process

4.1 Acumen implements robust recruitment and hiring processes globally to help prevent modern slavery, human trafficking, and forced labour.

4.2 Our procedures include appropriate checks on eligibility to work in the respective jurisdictions and to ensure all employees are protected against exploitation.

4.3 We aim to ensure that the majority of the team members are employed full-time basis. All employees having formal contracts and/or agreements that are regularly reviewed in accordance with local employment laws and best practices.

4. Reporting

Employees, contractors, and other stakeholders are encouraged to report any concerns related to modern slavery, human trafficking, or unethical labour practices without fear of retaliation. All reports will be treated confidentially and handled with appropriate sensitivity. Reports can be made through confidential reporting channel info@expressglobalemployment.com.

5. Monitoring and Review

This policy is reviewed annually to ensure its continued effectiveness and relevance. We regularly monitor compliance with this policy and assess our practices to identify areas for improvement. Where necessary, updates and enhancements will be implemented to strengthen our approach to preventing modern slavery within our operations and supply chains.

6. Communication

This policy is communicated to all employees, suppliers, and relevant stakeholders to ensure awareness of our commitment to preventing modern slavery and human trafficking. It is made available to relevant parties and promoted as part of our ongoing efforts to maintain ethical and responsible business practices.



Nick Ganzha

Director

Brain Source International Limited