

## Modern Slavery Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) and with consideration of Australia's Commonwealth Modern Slavery Act 2018 and sets out the steps taken by Acacium Group Limited, and the following entities in preventing modern slavery and human trafficking in its business and supply chains: Independent Clinical Services Limited, Pulse Healthcare Limited, Proclinical Limited, Liquid Personnel Limited and ICS Operations Limited.

For the purposes of this statement, the terms 'Acacium Group' or 'the Group' mean Acacium Group Limited and its subsidiaries as defined in the Companies Act 2006. This statement covers the calendar year 2025, which is also Acacium Group's financial year.

### Organisational Structure, Business and Supply Chains

The Acacium Group is the leading global healthcare delivery partner offering: staffing, managed services and innovative delivery models to health and social care systems and the global life sciences industry. It comprises market leading specialist brands, which combine workforce, services, deep clinical expertise, technology and analytics to deliver better outcomes for clients and patients.

At the Group's core is its purpose to 'improve people's lives through expert healthcare, social care and life sciences'. This drives everything we do and extends to a commitment to act ethically and with integrity in all our business dealings and relationships. We report annually on our commitment to being a responsible business in our Responsible Business Report.

The nature of our business is that it is 'people-driven' and 'tech-enabled' with most Group spend being allocated to maintaining and building our workforce and the various technology systems and products we use to run our businesses and serve our customers. Whilst we do deliver certain healthcare services, which are regulated by the appropriate regulators in the UK, we do not operate any healthcare facilities. Our supply chain mainly consists of third-party recruitment and talent acquisition agencies, who may be engaged to support us to deliver to our clients, and other goods and services needed to operate our business such as IT and stationery.

### Consultation with Controlled Entities

Acacium Group Limited is the reporting entity for the purposes of this statement. In preparing this statement, consultation has been undertaken with the entities owned or controlled by Acacium Group Limited that operate within Australia and other relevant jurisdictions.



The consultation process included:

- Engagement with senior management representatives from each controlled entity, including legal, finance, human resources and operational leads;
- Review of modern slavery risks identified within each entity's operations and supply chains;
- Confirmation of policies, procedures and controls in place at entity level;
- Input from the Group Responsible Business Committee;
- Circulation of the draft statement to relevant entity directors and senior managers prior to Board approval.

Where this statement is submitted as a joint statement under section 14 of the Commonwealth Modern Slavery Act 2018 (Cth), the reporting entity confirms that it has consulted with each entity covered by the statement in developing its content.

### **Due Diligence Processes**

Our principal business relationships are with the healthcare professionals and life science specialists who we introduce to, or deploy into, our clients' businesses. We have extensive systems and processes in place as part of our recruitment, screening, and onboarding procedures, which, in part, serve to reduce the risk of candidates, who are victims of modern slavery or human trafficking, from being engaged by one of our businesses.

In terms of our supplier base, following our mapping and risk review exercise detailed in our last statement (which we will repeat in 2025) we developed and launched a pilot, in our Life Sciences Division, of a new supplier due diligence questionnaire. The questionnaire is linked to our Dynamics CRM system and gathers detailed information from suppliers including on modern slavery incidents, policies, procedures and compliance. Such information is used to inform any further questioning and analysis by us of that supplier on modern slavery risk in their business or supply chain. Following the completion of the pilot phase we plan to roll-out the use of the questionnaire across the Group.

### **Risk assessment and management**

Whilst our supply base is limited, and most of our business is carried out in countries that have a low prevalence of modern slavery (being Western Europe, the United States and Australia), we recognise that modern slavery is a complex global issue particularly relevant to (amongst others) the healthcare sector.

We have established a Responsible Business Committee, chaired by our Group CFO, which meets quarterly to set the responsible business strategy, monitor compliance



and drive associated programs, practices, policies, risks, and opportunities, relating to environmental and social governance (including for modern slavery). The committee comprises members of senior management with a broad range of expertise and insight into every function of the Group's business including finance and governance, legal, sales and communications, human resources and procurement.

In terms of managing risks within our businesses, the controls in place as part of the recruitment, onboarding and deployment of workers are key. We also always seek to ensure appropriately robust modern slavery compliance obligations are included in our supplier contracts (managed through our contract lifecycle management system 'IronClad'). We have been subject to successful auditing on certain contracts with UK public authorities on compliance with the standards set out in Public Procurement Note ("PPN") 02/23 on tackling modern slavery in Government Supply Chains. Following the introduction of updated guidance in PPN 009 in 2025 we will be working to ensure a similar level of compliance in 2025.

On the operational side, we believe that the Group's safeguarding policies and requirements for front-line healthcare workers to have the appropriate level of safeguarding training are key to address front-line risk when workers are caring for vulnerable adults or young people. The support and tools available for colleagues and workers to raise concerns internally (including via an independent confidential helpline for colleagues) further helps to manage the risk of any such abuse going undetected or unreported.

### **Measuring effectiveness**

We have continued to maintain a qualitative approach and not yet adopted any rigid performance indicators, which seek to determine how effective the Group is at ensuring slavery or human trafficking is not taking place in any of our businesses or supply chain.

### **Policies**

The Group Clinical Director and Group Director of People and Culture are responsible for the policy management, control and administration of the policy development process which includes maintaining a central register of all policies, ensuring policies are reviewed in a timely manner, ensuring consistency through the policy development process, archiving superseded policies onto Acacium Group Pages and removing superseded policies.

Several Group policies specifically address the risk of modern slavery risk at a front-line level. They are the 'Safeguarding and Protecting Adults at Risk Policy' and the 'Safeguarding and Protecting Children Policy' (both reviewed biennially). These policies



include detail on warning signs and how to escalate/report concerns. More broadly the Group has Whistleblowing Policies covering employees, workers and external partners. These are designed to encourage the raising of genuine concerns of wrongdoing or harm across our businesses. Other relevant policies include our Clinical Governance Policy, Recruitment and Selection Policy, Equality, Diversity and Inclusion Rights Policy and Complaints Policy.

## Training

Training is essential to ensure our colleagues and workers understand this issue properly, and how to respond, in the context of their working environment. All Acacium Group employees complete an annual Legal and Ethical Business training course (which includes a module Modern Slavery). All our UK workers, who are healthcare practitioners, follow the Royal College of Nursing's Intercollegiate Document on Safeguarding which require all such workers to have completed either Level 2 or Level 3 Safeguarding training as a pre-requisite to deployment. This statement was approved by the Board of Directors of Acacium Group Limited on 25 June 2025.



Mike Barnard  
Chief Executive Officer  
On behalf of Pulse Staffing Australia Pty Ltd – part of Acacium Group  
25 June 2025