

Modern Slavery Statement

The Acumen Group is a Bermuda-headquartered group that provides a variety of services such as Corporate Services, Accounting and Payroll Outsourcing, Recruitment, Consulting, and Insurance Management Services from its operating subsidiaries based in Bermuda, South Africa, Cayman Island, Mauritius, Singapore, the United States of America, and the United Kingdom.

This document constitutes the 2020 modern slavery and human trafficking statement for all companies within the Acumen Group (together, "Acumen").

This statement demonstrates Acumen's ongoing commitment to mitigating the risk of slavery and human trafficking within its organisation and wider supply chains.

Acumen's Approach

Acumen is committed to complying with relevant modern slavery laws and, in doing so, endorses the implementation and promotion of ethical business practices to protect workers within its organisation and supply chain, from being abused and exploited.

Acumen has a zero-tolerance approach to all forms of slavery and is committed to ensuring our practices combat slavery and human trafficking within our business and supply chains by taking all reasonable steps necessary. We recognise our collective responsibility to be alert to the risks, however small, in our business and the wider supply chain.

Recruitment process

As an employer, Acumen respects international human rights standards and promotes fair reward and recognition, diversity, inclusion, and equal opportunity in all employee dealings, including decisions on hiring, remuneration, training and promotion.

Acumen has a comprehensive recruitment process to ensure compliance with relevant employment law; this includes reference and identification checks for new joiners.

Training

On an annual basis, Acumen staff are reminded of their obligations to identify and report suspicions of modern slavery.

Furthermore, Acumen requires all new employees upon joining to read the Group's Anti-Slavery and Trafficking Policy in the Employee Handbook, which brings awareness to the issues surrounding modern slavery.

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Policies

A suite of internal policies, such as the group's Governance Framework, cover all aspects of Acumen's conduct and sets the moral compass for the operation of the business. Acumen's policies promote consistently high business and ethical standards, designed to support its employees and other stakeholders, and ensure business partners and suppliers operate to equivalent standards.

Acumen continues to review its processes and controls to ensure they are operating effectively and proportionate to the risks faced in its supply chain.

Supply Chain

Acumen is committed to partnering with only those service providers who share common values and a commitment to combat slavery and human trafficking.

Acumen's supply chain largely consists of professional services providers such as consultants, accountants, law firms, contractors, software licensers, IT Service providers, and data hosting providers.

Given the nature of Acumen's business, contractors and suppliers used by Acumen are less likely to be susceptible to the risk of slavery and human trafficking. However, we require that all vendors with whom we enter agreements commit to providing their service at the highest level of business and professional ethics, and to ensure that they and their subcontractors comply with all applicable anti-slavery and human trafficking laws.

Reporting of Violations

Acumen provides the means for employees and other third parties to make confidential reports, raise complaints and request guidance about compliance with our Anti-Slavery and Bribery policy. These helplines provide another avenue through which we can ensure that any potential slavery, human trafficking, or wider human rights impacts are identified and dealt with appropriately in our organisation. Each report of suspected misconduct is investigated by appropriate persons within our organisation and where a violation of policy is found, corrective action is taken.

Annual statement

There were no identified cases or reports of modern slavery or violation of human rights within Acumen or within the supply chain.

Approval

This statement has been approved and signed on behalf of Acumen.

Richard Hartley Director Acumen Group Ltd.