



MODERN SLAVERY STATEMENT

1. Statement Commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by Acorn Recruitment Ltd, trading as Acorn by Synergie, during the financial year ended 31 December 2025 and reviewed for effectiveness in 2026, to identify, prevent and address the risk of modern slavery and human trafficking in our operations and supply chains, and has been approved by the Board of Directors and signed by our Managing Director Bernard Ward.

Modern slavery is a serious abuse of human rights. We are committed to conducting business with integrity, treating workers fairly and continually improving the controls used to prevent exploitation. We expect the same standards from our suppliers, clients and other business partners.

We take a zero-tolerance approach to modern slavery and will not knowingly engage with any organisation or individual involved in slavery, servitude, forced or compulsory labour, human trafficking or related exploitation. During the reporting period, no modern slavery breaches were reported to Acorn. We recognise, however, that the absence of reported cases does not remove the need for active risk identification, worker engagement and effective due diligence.

2. Our Organisation, operations and supply chains

Acorn Recruitment Ltd, trading as Acorn by Synergie, is a UK-based recruitment and workforce solutions provider. Established in 1992, Acorn provides permanent, temporary and contract recruitment together with managed workforce solutions across a range of sectors. Our UK parent company is Acorn (Synergie) UK Ltd which also includes Acorn Global Ltd and our ultimate parent company is Synergie SA, based in France.

- We operate offices across Wales, the North-West and the South-West of the UK.
- Our registered office is in Newport, South Wales.
- The Group has annual turnover of approximately £85 million.
- Workers supplied to UK clients live and work in the UK.
- We do not use overseas agents to source workers.

Our supply chain includes services that directly support recruitment and workforce delivery and services that support our wider business operations. These include:

- Recruitment technology and software providers
- Background checking and screening partners
- Facilities, vehicle and office service providers
- Professional services (legal, accounting, training)
- Umbrella companies – FCSA approved providers only
- Third-party labour providers - not used in 2025

Approved suppliers are expected to comply with our Modern Slavery Policy and complete pre-qualification due diligence. During 2025 100% of new suppliers completed our pre-qualification questionnaire in total 15 new suppliers.

3. Governance and Accountability

The UK Senior Management Team oversees Acorn's approach to modern slavery. The Managing Director approves and signs the annual statement after consideration with the Board of Directors. Modern slavery is included as an agenda item at Senior Management meetings, and senior managers have undertaken Stronger Together training.

The Compliance team maintains the modern slavery risk assessment, conducts monitoring and internal audit activity, investigates potential indicators of exploitation and supports escalation where concerns arise. Operational managers and recruiters are responsible for applying worker onboarding, identity, right to work and assignment monitoring controls.

4. Policies and Standards

Our approach is supported by policies and procedures that set expectations for employees, workers, suppliers and business partners. These include:

- Whistleblowing Policy
- Code of Conduct
- Synergie Supplier Code of Ethics
- Right to Work Compliance Procedures
- Anti-Bribery and Corruption Policy
- Remediation Policy

These are regularly reviewed and are accessible to all employees via our intranet.

5. Risk Assessment and Priority Risks

We recognise that recruitment and labour supply can expose temporary and migrant workers to increased risks of exploitation. Our annual modern slavery risk assessment considers risks within our own operations, labour supply arrangements and our wider supplier base.

The indicators and risk areas considered include:

- third-party control of a worker's identity documents, telephone, bank account or earnings
- duplicate or shared addresses, telephone numbers, bank accounts or emergency contacts that may indicate control by another person
- identity substitution, fraudulent documentation or inconsistencies in onboarding information
- recruitment fees, debt bondage, coercion, threats or restrictions on freedom of movement
- unusual dependency on an intermediary, family member or other third party
- risks involving temporary, migrant or otherwise vulnerable workers
- supplier arrangements where visibility of employment practices may be limited

Concerns identified through worker data, interviews, audits, complaints, whistleblowing, client feedback or supplier reviews may trigger further investigation and additional controls.

6. Due Diligence and Preventive Controls

- Verifying the identity and Right to Work of all candidates before placement.
- Worker onboarding checks covering identity, work history, bank account / address and references
- Monitoring worker data for potential signs of modern slavery (duplicate addresses, phone numbers, bank accounts, emergency contacts) this is completed weekly by the Compliance team for 100% of all workers.
- Compliance led investigations of potential indicators to ensure independent review.
- Monitoring for signs of worker exploitation during assignments.
- Comprehensive internal audit program conducted by the Compliance team.
- Reviewing supply chain partners for adherence to our standards.
- Conduct reference checks on all permanent employees, annual self-declaration outlining criminal convictions and undertake a 'fit and proper' test in line with GLAA requirements.
- Maintain accreditation to ISO9001 – independent audit ensuring compliance meets international standards.

Where a concern is identified, our priority is the safety and welfare of the employee/worker. We will assess the circumstances, preserve confidentiality, avoid action that could increase harm, involve appropriate internal specialists and, where required, refer concerns to relevant authorities or specialist support in line with our remediation policy.

7. Reporting Concerns

Employees and workers are encouraged to report suspected exploitation or human trafficking. Reporting channels include:

- a dedicated confidential telephone number for workers
- the company Whistleblowing Policy
- the Synergie Integrity whistleblowing platform, which can be used anonymously
- direct contact with Acorn representatives or the Compliance team

We communicate reporting routes through internal promotion, worker newsletters and worker handbook.

8. Training and Awareness

Modern slavery awareness is included in induction for all new employees and in annual refresher training for all staff 94% of all staff completed the training in 2025.

Managers receive additional guidance on identifying indicators and escalating concerns. Acorn also participates in external learning through Stronger Together and GLAA partner workshops.

We continually communicate throughout the year via monthly newsletters and lunch and learn sessions and during Anti-Slavery week during October.

9. Progress, Monitoring and Effectiveness

During the reporting period, we continued to develop our approach by:

- reviewing refresher training for employees
- increasing engagement with local communities through Acorn Impact corporate social responsibility activities
- launching a worker app that enables targeted awareness campaigns
- issuing quarterly newsletters to clients and candidates
- Direct worker feedback from our surveys and complaints received - survey and engagement findings are reviewed alongside compliance data to identify emerging risks, areas for improvement and opportunities to strengthen worker protection.

Our planned improvement activity is to:

- continue engagement with local communities and relevant external organisations
- Improve engagement with workers surveys need to include
- provide further manager training on remediation
- strengthen the recording of outcomes and effectiveness measures and improve our KPI's.
- use findings from monitoring, worker engagement and supplier due diligence to improve controls and future reporting

We assess effectiveness through risk assessment reviews, internal audit activity, worker-data monitoring, investigations, supplier reviews, training activity and feedback from workers and stakeholders. Findings are used to identify control improvements, further training needs and areas requiring management attention.

For the next reporting cycle, Acorn will strengthen outcome-focused monitoring by recording and reviewing measures such as:

- further completion of employee and manager training
- number of concerns raised and action taken
- supplier due diligence completion and follow-up actions
- worker interviews and survey findings
- audit findings, corrective actions and closure
- evidence that lessons learned have changed policy, training, supplier management or operational practice

Results will be considered by the Compliance team and Senior Management Team and will inform the next annual statement. Measures will be interpreted carefully: a higher number of concerns may indicate stronger awareness and reporting rather than poorer performance.

Signed by:



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Bernard Ward

Managing Director

Acorn (Synergie) UK Ltd / Acorn Recruitment Ltd T/A Acorn by Synergie

Version 2 2025 Statement – amended with clarifications

Version 1 2025 Statement - was signed 10 Mar 26