

Modern Slavery and Human Trafficking Statement

For the financial year ending 2025/26

1. Introduction

This statement is made pursuant to section 54 of the **UK Modern Slavery Act 2015** and sets out the steps Soda (Aco Projects t/a Soda) has taken, and continues to take, to prevent modern slavery or human trafficking in our business operations and supply chains.

2. Our Business

Soda is a UK-based consultancy providing consultancy services.

- All staff work remotely (home working) or attend client sites, public or privately hired spaces to deliver services.
- Our supply chains are limited and mainly consist of subcontractors, professional services, and suppliers of IT/office equipment.

3. Our Policies

We are committed to acting ethically and with integrity in all business relationships. Policies relevant to modern slavery include:

- **Supplier & Contractor Code of Conduct** – requiring compliance with UK law, including the Modern Slavery Act 2015.
- **Whistleblowing Policy** – enabling concerns to be raised confidentially without fear of retaliation.

4. Our Approach to Employees

Soda recognises its direct responsibility to ensure that no form of modern slavery, forced labour, or exploitation occurs within our workforce. We achieve this by:

- Ensuring all employees are recruited lawfully and have the **right to work in the UK**.
- Providing **contracts of employment** that are fair, transparent, and compliant with the **Employment Rights Act 1996**.

- Paying employees at or above the **UK National Minimum/Living Wage**.
- Supporting employee **wellbeing**, including mental health, through fair workloads, flexible working, and open communication.
- Providing employees with clear information on their rights and responsibilities.
- Maintaining channels for employees to **raise concerns confidentially** if they suspect unethical or unlawful practices.

5. Our Approach to Subcontractors and Suppliers

To reduce the risk of modern slavery in our supply chain:

- We work only with subcontractors and suppliers who demonstrate compliance with UK employment law.
- Subcontractors confirm that they pay at least the National Minimum/Living Wage and do not use forced or trafficked labour.
- We request evidence of suppliers' Modern Slavery Statements or policies where applicable.
- Anti-slavery and human trafficking clauses are included in contracts with subcontractors and service providers.

6. Training and Awareness

- Employees and subcontractors are made aware of the risks of modern slavery and how to recognise warning signs.
- We provide clear guidance on how to raise concerns confidentially.

7. Monitoring and Review

- This statement and our approach to modern slavery are reviewed **annually** by the Directors.
- Procedures are updated if higher-risk activities or suppliers are introduced.
- We remain committed to continuous improvement in tackling modern slavery and human trafficking.

Although our organisation employs fewer than 5 people and therefore is not legally required to publish a slavery and human trafficking statement, we are committed to transparency, ethical practice, and upholding human rights.