

# 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.