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ACAMS Statement on Modern Slavery

About ACAMS

With over 100,000 members spread across more than 180 jurisdictions, and more than 63 global chapters, ACAMS advanced its mission in impactful ways through the launch of more than 70 new or updated certifications and certificates, and more than 10 large-scale events hosted across the Americas, EMEA and APAC. Its best-in class expertise, global faculty and strong talent equips the organization with a competitive advantage and solutions that serve in advancing its mission and delivering societal impact. By educating, informing, and convening the anti-financial crime (AFC) community, and through its flagship events and seminars, training programs, certifications and certificates, ACAMS is making an outsized impact on the economic and social progress of communities around the world.

“ACAMS” as used herein, shall be inclusive of Alert Global Media, LLC, the sole member of Association of Certified Anti-Money Laundering Specialists, LLC, and its and their direct and indirect wholly owned subsidiaries.

The Modern Slavery Act 2015 (UK)

The Modern Slavery Act came into force on 26 March 2015. The Act clarifies the existing offences of slavery and human trafficking and introduces tougher penalties.

Section 54 of The Act requires commercial organizations in any sector with a global annual turnover of £36m or more who do business in the UK to publish a statement each financial year setting out the steps we have taken to ensure that no slavery or trafficking is taking place in our business and supply chain.

The term ‘modern slavery’ describes exploitation so severe that people are not able to leave their place of work. ‘Slavery’ refers to the condition of treating another person as if they were property, something to be bought, sold, traded, or even destroyed. Victims may be ‘owned’ by their employers and controlled through means including massive recruitment debts that they are unable to pay off, and threats of harm if they try to leave. The significant characteristic of all forms of slavery is that they involve one person depriving another person of their freedom.

Due to the nature of our business and the products and services ACAMS sources and sell, we consider the risk of slavery and human trafficking in our business and supply chains to be very low. However, we aim to periodically review the effectiveness of the relevant policies and procedures that we have in place.

Despite the level of risk, we strive to implement multiple layers of protections to help identify and mitigate the risk of slavery and human trafficking occurring in our business and supply chains.

Situations that may present a particular risk of modern slavery include:

- Where workers have fewer protections through inadequate laws and regulations, weak or non-existent enforcement, and poor business and government accountability;
- Where there are high levels of poverty among workers;
- Where there is widespread discrimination against certain types of workers (e.g., women and ethnic groups);
- Where there is widespread use of migrant workers;
- In conflict zones, and;
- In some specific high-risk industries (typically industries involving raw materials).

The risk of modern slavery affects almost every industry globally. As well as the potential for legal sanction, companies that fail to take effective action may also suffer severe reputational damage and loss of market share. ACAMS takes this risk very seriously.

Other responsible labor practice

UN Global Compact

The UN Global Compact is a United Nations initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labor, the environment and anti-corruption. Specifically, with regard to labor:

Principle 4: The elimination of all forms of forced and compulsory labor;

Principle 5: The effective abolition of child labor; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

EU Corporate Sustainability Reporting Directive (CSRD)

CSRD stipulates that sustainability reporting standards should specify the information that undertakings should disclose on social factors, including working conditions, social partner involvement, collective bargaining, equality, non-discrimination, diversity and inclusion, and human rights. Such information should cover the impacts of the undertaking on people, including workers, and on human health. The information that undertakings disclose about human rights should include information about forced labor and child labor in their value chains where relevant.

ACAMS Policy

ACAMS has adopted the following policy on modern slavery:

ACAMS shall recognize and adhere to internationally recognized human rights provisions in all locations where they operate, regardless of local business customs. ACAMS is also committed to providing safe and secure conditions for those working on ACAMS' behalf. ACAMS will not knowingly work with business partners who employ children or forced labor. This includes adherence to FAR 52.222-50, Combatting Trafficking in Persons. ACAMS Employees are expected to report any credible information on suspected human rights or human trafficking related violations.

Employees are made aware of the Modern Slavery Policy (Code of Conduct) and encouraged to report any concerns they have to the Senior Leadership Team or Legal & Compliance.

Suppliers

During the new supplier process, suppliers will be directed to the ACAMS' Statement to ensure that they are aware of and adhere to The Morden Slavery Act.

ACAMS is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. This statement reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

ACAMS requires that each of its suppliers complies with all laws, rulings, and regulations in the jurisdictions where they do business. This includes laws related to equal opportunities and non-discrimination, and laws prohibiting human trafficking and slavery. ACAMS' employees are encouraged to report to management if they suspect that any supplier is engaging in unethical behavior.

The suppliers shall comply with the principles outlined in the UN Global compact at <https://unglobalcompact.org/what-is-gc/mission/principles> and the Corporate Sustainability Reporting Directive at [Corporate Sustainability Reporting Directive \(CSRD\)](#).

Contract Provisions

ACAMS will ensure that its contractual arrangements with new or existing suppliers support its modern slavery policy.

Due Diligence Processes

As part of the ACAMS' initiative to identify and mitigate risk, it has in place systems to:

- Identify and assess potential risk areas in its supply chains.
- Mitigate the risk of slavery and human trafficking occurring in its supply chains.
- Monitor potential risk areas in its supply chains.
- Protect whistle-blowers.

As part of the review and ongoing development of the ACAMS' supplier relationships, it continues to specifically assess the slavery and human trafficking risks arising from each such

relationship and identifies appropriate steps to address any risks identified. Such steps may include placing appropriate contractual obligations on suppliers, working with the supplier to make improvements/corrective action plans, or ceasing to work with a supplier entirely.

ACAMS uses the following key performance indicators to measure how effective it has been at ensuring that slavery and human trafficking is not taking place in any part of its business or supply chains:

The percentage of suppliers (inclusive of any subcontractors) vetted for ethical labor practices.

The number of reported breaches in the past year.

Percentage of employees receiving training on identifying and addressing the risk of slavery and human trafficking in its business and supply chains.

Whistleblowing

ACAMS will continue to encourage whistleblowing to identify breaches of policy and contractual provisions in respect of modern slavery. Reporting systems are in place to ensure that whistle-blowers' identities are protected and that they have HR, Procurement and Senior Leadership support. For more information regarding reporting potential violations, please see acams.org/codeofconduct "Obligations to Report Violations of this Code."

Supply Chain Assessment and Reviews

ACAMS will seek to identify vulnerabilities through supply chain assessment and reviews. While it is impractical for ACAMS to audit and monitor each supplier in its entire supply chain at all levels, it will identify key vulnerabilities and will take a risk management approach to ethical procurement and contracting. ACAMS will ensure that its tender processes assist in assessing supplier compliance with the law.

Training and Awareness

ACAMS' internal policies and procedures aim to ensure that its members understand and comply with all laws, rulings, and regulations in its area of business.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chains and business, ACAMS provides annual ethics and compliance training to its employees. Managers are required to be trained annually on all laws affecting their global businesses and that includes laws prohibiting human trafficking and slavery.

REPORT ON THE 2023 FINANCIAL YEAR

ACAMS is not aware of any breaches of the Modern Slavery Act 2015 in the context of its business operations during the financial year 202X following the close of the financial year. There were breaches reported in 0 direct suppliers within the same financial year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ACAMS' slavery and human trafficking statement for the financial year ending 12/31/2023. It was approved ACAMS on September 4, 2024.