

## **Key GRP Limited**

### **Policy Statement**

This policy ensures that Key complies with the Modern Slavery Act 2015, and sets out the responsibilities for employers and employees. Procedures relating to modern slavery can be found in the company handbook.

Key is committed to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

1. Our policies in relation to slavery and human trafficking.
2. The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains.
3. Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking take place, and the steps that we have taken to assess and manage the risk.
4. An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, and the way that we assess and manage the risks that are identified.
  - ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
  - ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
  - carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
  - ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
  - appointing a named individual to oversee the compliance with the Modern Slavery Act 2015.
  - identifying and addressing any areas of high risk in our supply chain
  - providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

## Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

### Commitments

- We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

### Risk Assessment

#### Risk Identification

We regularly assess the risk of modern slavery within our operations and supply chains. Key risk factors identified for the retail construction sector include:

- Use of subcontractors and labour-only suppliers
- Temporary, agency, or migrant labour
- Multiple tiers of subcontracting
- Tight project deadlines creating pressure on labour practices
- Overseas sourcing of certain materials

#### 6.2 Risk Areas

| Risk Area          | Description                            | Risk Level  | Mitigation Measures                                       |
|--------------------|----------------------------------------|-------------|-----------------------------------------------------------|
| Subcontract labour | Labour-only subcontractors or agencies | Medium–High | Approved supplier list, right-to-work checks, site audits |
| Agency workers     | Short-term or temporary labour         | Medium      | Agency due diligence, contractual clauses                 |
| Materials supply   | Overseas manufactured products         | Medium      | Supplier questionnaires, ethical sourcing expectations    |

|                   |                                          |        |                                              |
|-------------------|------------------------------------------|--------|----------------------------------------------|
| On-site practices | Excessive hours or unsafe conditions     | Medium | Site supervision, inductions, whistleblowing |
| Payment practices | Unlawful deductions or withholding wages | Medium | Contract reviews, payment transparency       |

### Ongoing Review

Risk assessments are reviewed: - Annually - When new suppliers are engaged - When entering new markets or services - Following any reported incidents or concerns.

### Due Diligence and Controls

We operate the following measures to reduce the risk of modern slavery:

- Supplier pre-qualification and onboarding checks
- Contractual clauses requiring compliance with the Modern Slavery Act 2015
- Right-to-work checks for all site workers
- Verification that workers are paid at least the National Minimum Wage
- Prohibition of worker-paid recruitment fees
- Audits and spot checks on high-risk sites or suppliers

### Training and Awareness

We provide appropriate training to ensure employees understand: - What modern slavery is - How to identify warning signs - How to report concerns

Training is provided to: - Senior management - Procurement teams - Site managers and supervisors

### Reporting Concerns (Whistleblowing)

Employees and workers are encouraged to report any concerns related to modern slavery or unethical labour practices without fear of retaliation.

Reports may be made to: - Line Manager - HR or Senior Management - Confidential whistleblowing channel (where applicable)

All reports will be investigated promptly and confidentially.

### Breaches of This Policy

Any breach of this policy by employees may result in disciplinary action, up to and including dismissal.

Any breach by suppliers or subcontractors may result in: - Immediate remedial action - Suspension or termination of contracts - Removal from approved supplier lists

### Continuous Improvement

We are committed to continuously improving our practices to combat modern slavery by: - Reviewing policies and procedures annually - Strengthening supplier engagement - Monitoring legislative and industry developments