



## Modern Slavery Policy Statement

Reference Number:	HR 017
Document Date:	11/07/19
Revision:	1

### Key Electrical Contractors and Storefitters 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.

Steve Saddler Managing Director

13th February 2023

On behalf of Key Electrical Contractors and Storefitters Limited



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### 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.

Consistent with our risk based approach we may require:

- employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our policy.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the policy.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our policy.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

### Training

Employees will receive training on modern slavery and human trafficking at induction. The policy is held within the company handbook and refresher training in the shape toolbox talks and other media will be given.