

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 30 April 2023.

KCIL LTD (the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

### Organisational Structure

KCIL LTD has business operations in the United Kingdom. We operate in the charity sector. The nature of our supply chains is as follows:

We work with a number of key direct suppliers, who provide us with goods, such as equipment for our premises, and services, such as outsourced business processes and IT software.

- Superhighways - IT support
- Cushman and Wakefield - office rental
- Tudor John - accounts
- Total Support - cleaning
- Essential Copiers - photocopier maintenance
- Cardea Healthcare - training
- Solve - website maintenance

For more information about the Company, please visit our website: <https://kcil.org.uk/>

### Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

Whistleblowing policy

KCIL's Whistleblowing policy seeks to prevent modern slavery

**Clear Reporting Mechanism:**

There is a confidential and accessible reporting mechanism for employees or external parties to report concerns related to modern slavery.

**Anonymity and Protection:**

Confidentiality of the whistleblower's identity is protected to prevent the risk of retaliation.

**Non-Retaliation Commitment:**

KCIL explicitly prohibits retaliation against individuals who report concerns in good faith. KCIL explicitly communicates the consequences of any form of retaliation against whistleblowers.

**Investigation Protocol:**

Reported concerns related to modern slavery will be investigated by KCIL's CEO, with oversight from KCIL's Chair of Trustees.

**Training and Awareness:**

Employees and relevant stakeholders will be trained to recognise and report signs of modern slavery. KCIL endeavours to raise awareness about the importance of the whistleblowing policy and the organisation's commitment to eradicating modern slavery.

**Legal Compliance:**

KCIL demonstrates a commitment to comply with relevant laws and regulations related to modern slavery and human trafficking and aligns the whistleblowing policy with legal requirements in the jurisdictions where the organisation operates.

**Communication and Transparency:**

KCIL will communicate the whistleblowing policy clearly to all employees and stakeholders. KCIL will regularly update employees on the outcomes of investigations and actions taken in response to reports.

#### Integration with Ethical Business Practices:

KCIL embeds its whistleblowing policy within the broader framework of the organisation's commitment to ethical business practices and corporate social responsibility.

#### Continuous Improvement:

KCIL will review and update its whistleblowing policy to ensure its effectiveness in addressing modern slavery concerns on a yearly basis.

#### Staff code of conduct

KCIL's Code of Conduct seeks to prevent modern slavery by:

##### Clear Prohibitions:

KCIL's code of conduct explicitly states the organisation's zero-tolerance policy towards modern slavery, human trafficking, and any related practices.

##### Supply Chain Responsibility:

KCIL is committed to responsible sourcing supply chain partners that we work with. KCIL encourages suppliers and business partners to adhere to ethical labour practices and demonstrate their commitment to preventing modern slavery.

##### Human Rights Commitment:

KCIL commits to upholding human rights, including the rights of workers, as a fundamental part of the organisation's values.

##### Employee Training:

KCIL will incorporate training programs to educate employees about modern slavery, its indicators, and the role they can play in preventing it. KCIL will foster awareness about the importance of ethical business practices and the impact of supply chain decisions on human rights.

##### Reporting Mechanisms:

There are clear reporting mechanisms within the Code of Conduct for employees and stakeholders to report suspected cases of modern slavery. KCIL will ensure that individuals feel safe and supported when reporting concerns.

#### Audits and Due Diligence:

KCIL is committed to conducting regular audits and due diligence assessments to identify and address any risks of modern slavery within its operations and supply chain.

#### Compliance with Laws and Standards:

KCIL complies with relevant laws and international standards related to modern slavery, such as the UK Modern Slavery Act and other applicable legislation.

#### Supplier Engagement:

KCIL engages with suppliers and contractors to ensure they also have policies and practices to prevent modern slavery.

#### Consequences for Violations:

The code of conduct clearly states the consequences for any violations of the Code of Conduct related to modern slavery.

#### Continuous Improvement:

KCIL commits to regularly reviewing and updating the Code of Conduct to reflect evolving best practices, legal requirements, and societal expectations regarding modern slavery.

#### Safeguarding policy

KCIL's Safeguarding policy seeks to prevent modern slavery by:

#### Definition and Recognition:

KCIL will clearly define modern slavery within the context of its safeguarding policy, ensuring that all stakeholders understand what constitutes modern slavery and its various forms (e.g., forced labour, human trafficking).



#### Risk Assessment:

KCIL will conduct thorough risk assessments to identify potential areas of vulnerability within the organisation's operations, supply chain, and business relationships.

#### Training and Awareness:

KCIL will implement training programs for employees, suppliers, and other relevant stakeholders to raise awareness about the signs of modern slavery and the importance of prevention.

#### Due Diligence and Auditing:

KCIL will integrate modern slavery considerations into due diligence processes, especially in supply chain management. KCIL will conduct regular audits to assess compliance with the safeguarding policy and identify areas for improvement.

#### Reporting Mechanisms:

KCIL will establish clear and confidential reporting mechanisms for individuals to report concerns related to modern slavery. KCIL will ensure that individuals feel safe and supported when reporting suspicions or incidents of modern slavery.

#### Collaboration and Engagement:

KCIL will collaborate with relevant external organisations to share information, best practices, and resources related to preventing modern slavery. KCIL will engage with industry initiatives and collaborative efforts to address modern slavery collectively.

#### Supplier and Contractor Engagement:

KCIL will encourage suppliers and contractors to implement their safeguarding policies and practices.

#### Whistleblower Protection:

KCIL explicitly states protections for whistleblowers within the safeguarding policy to encourage reporting of modern slavery concerns. KCIL will communicate consequences for any form of retaliation against whistleblowers.

#### Legal Compliance:

KCIL will ensure that the safeguarding policy aligns with relevant national and international laws and regulations addressing modern slavery. KCIL will stay informed about changes in legislation and adjust the policy accordingly.

#### Continuous Improvement:

KCIL commits to regular reviews and updates of the safeguarding policy to reflect evolving best practices, industry standards, and changes in the organisation's risk profile.

#### Support and Remediation:

KCIL will establish procedures for providing support and remediation for individuals who may have been affected by modern slavery, either directly or indirectly through the organisation's activities.

#### Transparency and Reporting:

KCIL will communicate the organisation's efforts and progress in preventing modern slavery through annual modern slavery statements. We make sure our suppliers are aware of our policies and adhere to the same standards.

### **Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Provide protection for whistleblowers.

### **Risk and Compliance**

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We consider that we operate in a high-risk environment because KCIL assists with the recruitment of personal assistants (PAs), who are employed by disabled people and their families (KCIL's Service Users). Recruitment is considered a high-risk activity for modern slavery due to several factors that make it susceptible to exploitation and abuse. These risks are often associated with vulnerabilities in the recruitment process that can be exploited by individuals or criminal organisations involved in human trafficking and forced labour. To address the high-risk nature of recruitment in relation to modern slavery, KCIL follows an ethical recruitment practice. KCIL works with its Service Users to ensure transparency, fair wages, reasonable working conditions, and protection of workers' rights throughout the recruitment process.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

### **Effectiveness**

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of suppliers - 50% of suppliers each year.

### **Training Staff**

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.

- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

The statement was approved by the board of directors.

Signed Jason Lamont, KCIL CEO, 31/3/23



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