



MODERN SLAVERY STATEMENT

This statement sets out KAEFER Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year for 2021.

As part of the sector in which we work, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

> ORGANISATIONAL STRUCTURE

This statement covers the activities of KAEFER Limited. We are a multi discipline contractor providing a unique range of industrial services, delivered by experienced and multi-disciplined specialists across the UK & Ireland. KAEFER in the UK is a part of the KAEFER Group, head quartered based in Bremen, Germany.

> SUPPLY CHAINS

KAEFER's supply chain provides goods and services for the delivery of our industrial services including scaffolding, insulation, asbestos removal and painting. From time to time we also engage in additional services within the industrial sector. Purchasing activities for KAEFER Limited take place from the UK by a dedicated purchasing team and the majority of our suppliers are based in UK or Ireland.

POLICIES & PROCEDURES

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking within its own operations. All employees are made aware of these policies and are expected to adhere to them in carrying out their duties as employees of KAEFER Limited. We also expect our business partners, suppliers and contractors to comply with the KAEFER Code of Business Conduct.

KAEFER's Modern Slavery Policy & Procedure

Our policy reflects KAEFER's continuing responsibility to combat slavery and human trafficking and is reviewed annually.

KAEFER's Whistleblowing Procedure

This ensures that both employees and non-employees can raise any concerns or wrongdoings, including slavery and human trafficking in a confidential way. The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline.

The KAEFER Code of Business Conduct and compliance programme sets out our policies relating to our corporate goals and values as KAEFER is strongly committed to risk management and compliance. The KAEFER Code of Business Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct, ethical behaviour when operating in any capacity as a KAEFER Limited representative and in managing its supply chain.

KAEFER Compliance

At KAEFER we understand Compliance as a set of guidelines, rules and procedures that are designed to prevent, monitor and resolve anything that does not conform with legal, ethical and business standards.

KAEFER Compliance Management System involves several components:

- > A compliance organisation with local and global contact persons: Expert Group Compliance Officers. KAEFER Limited's Local Compliance Officer is Russell Cook, Head of Finance.

- > A confidential and secure KAEFER Compliance Helpline (a “whistleblowing” helpline) is available, which allows employees to contact the KAEFER Compliance team for advice, to raise concerns or to report potential wrongdoing, misconduct, unethical and criminal behaviour or regulatory issues. Reports can be made anonymously if desired.

RISK, DUE DILIGENCE AND SUPPLY CHAIN APPROVAL

KAEFER Limited has identified a particular area of risk of modern slavery and unethical business practices in its supply chain arises where suppliers are providing materials which contain certain materials which originate from the Democratic Republic of Congo or adjoining countries in accordance with the US Securities Exchange Commission Rule of Conflict Minerals issued on August 22, 2012 and any updates thereof. KAEFER Limited has not identified any other particular risks of modern slavery or human trafficking in its supply chain.

KAEFER Limited has an open and transparent process in its supply chain and as part of its initiative to identify and mitigate risk, will ensure all those in its supply chain and contractors comply with its ethics. KAEFER Limited has in place a supply chain compliance programme which is undertaken by the Purchasing Department.

KAEFER Limited supplier approval process requires that we:

- > Identify and assess potential risk areas in our supply chains.
- > Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- > Monitor potential risk areas in our supply chains.
- > Protect whistle blowers.
- > Invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

To mitigate the risks of modern slavery and human trafficking in our supply chain, KAEFER Limited undertakes due diligence when considering taking on new suppliers or contractors and regularly review existing suppliers and subcontractors. KAEFER Limited will not directly source any materials from the Democratic Republic of Congo or adjoining countries.

When engaging a new supplier, KAEFER Limited undertakes investigations into the prospective supplier and issues questionnaire to each new supplier which requests details of what measures the supplier has in force to detect modern day slavery within its own business supply chain. Prospective suppliers are asked to explain how their organisation ensures that its own employees and those of its suppliers behave in an ethical manner and how they ensure their workers benefit from acceptable labour standards and their human rights are respected. Copies of modern-day slavery policies are also requested for our review.

KAEFER Limited’s terms with suppliers require each supplier to confirm compliance with the KAEFER Code of Business Conduct which makes it clear KAEFER Limited adopts a zero approach to all forms of forced labour. Suppliers with whom we enter into contracts are also required to provide written declaration that their business activities are free from unethical practices and child labour and materials do not contain conflict materials which originate from the Democratic Republic of Congo or adjoining countries.

Suppliers are subject to audit by KAEFER Limited audit team, where suppliers will be audited against our purchasing processes including Modern Slavery Act requirements.

KAEFER Limited has a dedicated compliance team which consists of the involvement from the following departments; Audit and Compliance to BS EN ISO 9001, 14001 & 45001 for products and services, HR, People, Purchasing and Business Development.

KAEFER Limited is independently audited to BS EN ISO 9001, 14001 & 45001 and SSIP (safety schemes in procurement) on a regular basis to conduct an externally facilitated review to bring insights on ways to we can tackle slavery and human trafficking.

EMPLOYEES

With regards to employees, KAEFER Limited predominately works to a number of National and Site Agreements in respect to pay and working conditions and in doing so recognises the trade unions which operate in the industry.

TRAINING

As a business KAEFER Limited provides various means of training and sharing of information to all its employees. This includes e-learning to employees in:

- > KAEFER Code of Business Conduct Anti – corruption
- > Anti Trust
- > Conflicts of Interest
- > Preventing Fraud

We also regularly ensure that we provide awareness and training to all employees with regards to Whistleblowing and KAEFER's global whistleblowing system: the KAEFER Compliance Helpline, which enables early detection and prevention of misconduct.

In addition, we continue to raise awareness within our purchasing and procurement teams about slavery and human trafficking. Modern Slavery e-learning has been rolled out to our supply chain team and will continually be reviewed and refreshed.

EFFECTIVENESS

KAEFER Limited monitors and will continue to monitor the effectiveness of our measures through audits and will consider the introduction of appropriate key performance indicators (KPIs) if failures are identified.

During the financial year 2021, KAEFER Limited carried out 10 supplier ISO 9001 quality audits on its supply chain. This number was lower than usual due to the impact of the Covid-19 pandemic. No instances of modern slavery or human trafficking have been identified for the financial year ending December 2021.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken in 2021 to ensure that there is no slavery or human trafficking in our supply chain, in 2022 we intend to triple the number of supplier ISO 9001 quality audits carried out and have engaged two additional members of staff to assist with this process. In 2022, KAEFER Limited will be encouraging its suppliers to undertake online training which has been prepared by an external provider for the UK nuclear industry to address the risks of counterfeit or suspect items in the nuclear sector. Such items are often manufactured or sourced using unethical means or by using slave labour. The KAEFER Limited purchasing team will also be reviewing the future strategy of purchasing which will consider supply chain governance, supplier risk profiles and risk assessment and areas of focus for supplier audits with a view to minimising risk of unethical business practices within its supply chain.

This statement was approved by the organisation's Board of Directors who review and update it annually. It was approved by the board on 1st June 2022. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking for the financial year ending December 2021.

Executed by KAEFER Limited by Chris Foulkes, Chief Executive Officer

1st June 2022

