

MODERN DAY SLAVERY STATEMENT

Rule: MODERN DAY SLAVERY
Released by: LEGAL

Valid as of: 12.06.2024
Next review: 30.06.2025
Reviewed and issued annually

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 chain.

This statement relates to actions and activities during the financial year for 2023.

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 chain is 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 larger KAEFER Group, headquartered in Bremen, Germany. The KAEFER Group Policy Statement on Human Rights and Environmental Protection (available at https://kaefer.com/wp-content/uploads/2024/03/240101_KAEFER-Policy-Statement-Human-Rights-Environm.-Protection.pdf) sets out the core principles with which all group companies must comply.

> SUPPLY CHAIN

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. Procurement is managed centrally by the UK Supply Chain team. The majority of our vendors are based in the 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. We also expect our business partners, vendors and contractors to comply with the KAEFER Code of Business Conduct.

KAEFER's Policies & Procedures

Our policies reflect KAEFER's continuing responsibility to combat slavery and human trafficking and are 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 chain 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.

KAEFER Code of Business Conduct

The KAEFER Code of Business Conduct and compliance programme set 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 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's Local Compliance Officer is Russell Cook, Head of Finance & Compliance.
- > 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 has identified the following areas in its supply chain, which pose the highest risk of modern slavery and unethical business practices:

- > Where vendors are providing materials which contain materials that originate from the Democratic Republic of Congo or adjoining countries in accordance with the US Securities Exchange Commission Rule of Conflict Minerals issued on 22 August 2012 and any updates thereof; and
- > Where labour agencies are providing unskilled labour.

KAEFER has not identified any other area which present an increased risk of modern slavery or human trafficking in its supply chain.

KAEFER has an open and transparent process in its supply chain and as part of its initiative to identify and mitigate risk, require all those in its supply chain to comply with its Code of Business Conduct. KAEFER Limited has in place a supply chain compliance programme which is undertaken by the Supply Chain Department.

KAEFER vendor approval process requires that we:

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

KAEFER takes a risk based approach to the onboarding of new vendors and undertakes appropriate due diligence prior to engaging with new vendors. All new vendors are required to go through a robust appraisal process and agree and sign acceptance of the KAEFER Supplier Code of Conduct and the KAEFER Code of Business Conduct. Prospective vendors 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. Approved vendors are periodically assessed to ensure that they continue to meet the criteria and standards expected and are subject to audits in line with the KAEFER audit schedule. KAEFER does not directly source any materials from the Democratic Republic of Congo or adjoining countries.

KAEFER has a dedicated compliance team which consists of the involvement from the following departments; Audit and Compliance, HR, People, Supply Chain and Business Development.

KAEFER 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 most site based employees, KAEFER 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. Many of our customers also place contractual requirements on us to respect minimum standards of welfare and remuneration for our employees.

We only employ agency workers through reputable employment agencies that adhere to our standards regarding anti-slavery and human trafficking.

> **TRAINING**

KAEFER provides the following mandatory training to all employees:

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

Periodic communication is provided to ensure that employees are aware of the whistleblowing process and points of contact.

We raise awareness within our Supply Chain team about modern slavery and human trafficking by providing regular training which focuses on ethics and modern slavery. Several of the Supply Chain team are members of the Chartered Institute of Procurement and Supply and demonstrate their commitment to ethical business practices through additional learning and CPD.

In 2023, KAEFER Group implemented ESG training for its vendors globally using the online Integrity Next Platform. The platform is a vendor self-assessment tool which gathers data to identify areas for improvement in compliance and enhances KAEFER's vendor appraisal process.

> **EFFECTIVENESS AND FURTHER STEPS**

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

During the financial year 2023, KAEFER carried out 11 audits on its supply chain. No instances of modern slavery or human trafficking have been identified for the financial year ending December 2023.

In 2023, forty five of KAEFER's vendors went through the Integrity Next assessment process and in 2024 KAEFER plans to increase that to 100 vendors. KAEFER works with those vendors whose results indicate they need further assistance in implementing processes and procedures to manage the risk of modern slavery and human trafficking to bring them up to a standard which is acceptable to KAEFER.

Following our 2023 commitment, we intend to increase the number of Vendor audits in 2024 to 20, ensuring those vendors that are considered a higher risk of modern slavery and human trafficking are treated as a priority.

This statement was approved by the organisation's Board of Directors who review and update it annually. It was approved by the directors on 11.06.2024. 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 2023.

[REDACTED]

[REDACTED]

[REDACTED]