



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 chain.

This statement relates to actions and activities during the financial year for 2022.

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.

> 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 Limited. 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 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 & 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 Limited 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 Limited has not identified any other 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, 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 Limited 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 Limited 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 Limited audit schedule. KAEFER Limited does not directly source any materials from the Democratic Republic of Congo or adjoining countries.

KAEFER Limited 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 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**

KAEFER Limited 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.

> **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 2022, KAEFER Limited 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 2022.

> **FURTHER STEPS**

Following our 2022 commitment, we intend to increase the number of Vendor audits in 2023 to 20, ensuring those vendors that are considered a higher risk of modern slavery and human trafficking are treated as a priority.

In 2023, KAEFER Limited intends to implement ESG training for its vendors. The training will enhance the current vendor appraisal process for those vendors who present a higher risk of modern slavery and human trafficking.

This statement was approved by the organisation's Board of Directors who review and update it annually. It was approved by the directors on 22 June 2023. 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 2022.

Executed by KAEFER Limited by Chris Foulkes, Chief Executive Officer

