

Modern Slavery Policy

1. Introduction

Kinetic Solutions Group (KSG) is committed to preventing modern slavery and human trafficking in all its operations and supply chains. As an engineering and manufacturing company, we recognise our responsibility under the UK Modern Slavery Act 2015 and strive to ensure that our business activities, including production, procurement, and workforce management, do not support or enable any form of slavery, forced labour, or human trafficking.

2. Scope

This policy applies to all employees, contractors, suppliers, and business partners of KSG. It outlines our approach to identifying and mitigating the risks of modern slavery within our business operations, engineering projects, and manufacturing supply chains.

3. Purpose

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms as shown below, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We will raise awareness of modern slavery and our expectations of what should be done to address any issues or suspicions, through this policy and associated training.

There are a number of crimes that are covered under the definition of modern slavery these are:

- Bonded labour – individuals who are forced into debt by paying to get a job or mandatory equipment or have their passports taken to restrict their movements.
- Forced labour – individuals who are forced to work long hours for little or no pay in poor conditions, under verbal or physical threats to themselves or their families.
- Trafficking – individuals or groups moved from one area to another for forced or bonded practices.
- Criminal exploitation – where a victim is exploited to commit a crime.
- Sexual exploitation – including sexual abuse, forced prostitution, and abuse of children for the production of images or videos.
- Domestic servitude – where an individual is forced to work in private households with restricted freedom and work long hours for little or no pay.

Less commonly identified crimes include organ removal, forced marriage, and illegal adoption.

4. Our Commitment

KSG is dedicated to:

- Ensuring that modern slavery does not occur within our engineering and manufacturing operations or supply chains.
- Conducting due diligence on suppliers, particularly those providing raw materials, components, and subcontracted manufacturing services.
- Providing training to employees, especially procurement, supply chain management, and production staff, to recognise and report concerns related to modern slavery.
- Establishing clear reporting mechanisms for employees, suppliers, and stakeholders.

5. Risk Assessment and Due Diligence

We undertake regular risk assessments of our supply chains and operations to identify areas of potential vulnerability. Our due diligence process includes:

- Assessing supplier compliance with modern slavery regulations, with a focus on engineering and manufacturing subcontractors.
- Including contractual obligations related to anti-slavery measures in supplier and subcontractor agreements.
- Conducting audits and requiring evidence of compliance from key suppliers, including ethical sourcing of materials and fair treatment of workers.

6. Reporting and Whistleblowing

We encourage employees and stakeholders to report any concerns regarding modern slavery through our confidential whistleblowing procedure which can be found on the home page of our HRIS. Reports can be made anonymously, and we ensure protection against retaliation.

7. Training and Awareness

We provide specialised training to employees and management, particularly in supply chain, procurement, and production roles, on the risks of modern slavery and the measures in place to prevent it. Awareness initiatives ensure that all staff understand their role in upholding this policy.

8. Compliance and Review

Failure to comply with this policy may result in disciplinary action, including termination of employment or contracts. This policy is reviewed annually to ensure its effectiveness and alignment with legal requirements.

9. Approval

This policy has been approved by Kinetic Solutions Group's senior management and is publicly available to all employees, customers and Supply Chain Partners.

Signed by the Chief Executive Officer:

Danny Pickard

[Danny Pickard \(Apr 29, 2025 16:30 GMT+8\)](#)

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