

THE MODERN SLAVERY ACT 2015 – K1 POLICY

What is Modern Slavery?

Modern slavery is an international crime, affecting an estimated 29.8 million slaves around the world. It is a growing global issue that transcends age, gender and ethnicities. It includes victims who have been brought from overseas and vulnerable people in the UK, who are forced to illegally work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

Our policy

K1 is working towards establishing a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation. We will also actively consider how we support or conduct business with organisations involved in slavery, human trafficking, forced or child labour.

Our values, which include: excellence; respect, and responsibility, underpin our culture and how we do business. They are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, clients and the world at large. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

Our procedures

We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

Due Diligence and Risk Management in our Employment processes:

- Robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is 16 and above.
- Market-related pay and reward, which is reviewed annually and linked to professional services firms' benchmarks.
- An enhanced benefits package, providing additional health and welfare options to support our people's (and their families) lifestyle choices.

Due Diligence and Risk Management in our supply chains:

We recognise our company is exposed to greater risk when dealing with its suppliers, particularly those who have operations/suppliers in other territories. The following measures to review and manage this risk are in place:

- examination of our supply chains. We rigorously assess existing and potential suppliers and form a commitment to collaborate closely with suppliers to help them understand and work towards their own obligations under the Modern Slavery Act.

- a Responsible Purchasing Policy, which reflects our commitment to and focus on suppliers' ethical supply chain(s).
- a Supplier Code of Conduct, which is used for all new major suppliers of goods or in re-tendering, clearly stating the company's intention to step away (without penalty) if any occurrences of modern slavery are discovered.

Both the Responsible Purchasing Policy and Supplier Code of Conduct will be reviewed annually, and updated as and when deemed appropriate by the K1 Directors, to ensure they are continually developed and remain fit for purpose. The monitoring of suppliers has increased significantly in 2018, to include monitoring in accordance with the Criminal Finances Act.

Employee training:

We want to help our people to understand more about this growing issue and how to report any suspicions they may have, whether in a business or personal context. We have highlighted the modernslavery.co.uk site to all our employees, which holds useful information on how to recognise different types of slavery, how to spot the signs and provides details of a telephone helpline.

We have developed resources and made them available to our people, including summary documents with an overview of the Modern Slavery Act, and links to the modernslavery.co.uk site.

Reporting knowledge or suspicion of slavery:

- We already have in place a whistleblowing policy which ensures that anyone who has concerns, for example, about how staff are behaving, has a means of raising their concerns confidentially. The policy supports employees in reporting any suspicions our employees may have regarding modern slavery and our employees have been signposted to this in our communications.

Looking forward: key performance indicators

Going forward, we aim to work towards:

- developing an employee training module that will be undertaken by all K1 employees. This training will outline what modern slavery is, how to identify it and what individuals should do if they suspect there are any cases of slavery occurring. Completion of this training will form a compulsory part of our employees' annual review and new starter induction processes.
- developing a procedure to monitor how our suppliers comply with our supplier Code of Conduct.

2018 Summary

During 2018, there were no concerns relating to slavery either discovered through our processes nor reported by employees or third parties.

K1 shall continue to take responsibility for this statement and its objectives, which will be reviewed and updated as appropriate and for each financial year.

This statement covers the K1 Security financial year of 2019(April to March) and was approved by the board of Directors on the 21st May 2019.

Martin Barrington
Managing Director