

**KIN+CARTA**

# Modern Slavery Policy



Building a world that  
works better for everyone

March 2024 – Version 1.1

Classification: **Public**

## **Contents**

[1. Aim of the Policy](#)

[2. Scope of the Policy](#)

[3. Related Documents](#)

[4. Supply chains](#)

[5. Freedoms and Prohibited Conducts](#)

[6. Awareness, Training and Implementation](#)

[7. Breaches of this Policy](#)

[8. Speaking up about breaches or potential breaches of this Policy](#)

[9. Remediation](#)

[10. Compliance and oversight](#)

[11. Contact](#)

---

# Modern Slavery Policy

## For Kin and Carta plc and its subsidiaries

(together hereinafter referred to as 'Kin + Carta', 'we', or 'us')

### 1. Aim of the Policy

At Kin + Carta we are committed to acting responsibly and ethically in our business conduct. We respect and support the dignity, wellbeing and human rights of our employees, the workers in our extended supply chain, the communities in which we live and work, and those affected by our operations.

Human rights are universal, applying to everyone in every country. They include the right to life and liberty, freedom from slavery, freedom of opinion and expression, the right to work and education, and many more.

Kin + Carta is committed to upholding its responsibility to respect human rights, a foundational principle of the United Nations (UN) 'Guiding Principles on Business and Human Rights' framework that applies to companies. This means that we must avoid infringing on the human rights of others through due diligence of our operations and should address any adverse human rights impacts associated with our operations. Kin + Carta is also committed to promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all in accordance with the Sustainable Development Goal 8 of the UN (UNSDG 8).

The practices of:

- 'Modern Slavery' (slavery, forced labour and human trafficking) and

- 'Child Labour' (children's engagement in work that is dangerous or may cause harm to them mentally, physically, socially or morally, child slavery and child labour, which also interferes with their education depriving them of their childhood, liberty and dignity) violate numerous human rights, including the prohibition of slavery, the right to freedom of movement, and the right to education. Therefore, we have a zero tolerance policy toward any form of Modern Slavery and/or Child Labour.

Kin + Carta is committed to respecting the International Bill of Human Rights and complies with the laws applicable to its geographic operations including UK Modern Slavery Act 2015, the Minimum Age Convention, 1973 (No.138) and Worst Forms of Child Labour Convention, 1999 (No. 182) as set out in the International Labour Organisation ('ILO') Fundamental Conventions. This Policy reflects our commitment to implementing and enforcing effective systems and controls to mitigate the risk of Modern Slavery and Child Labour taking place anywhere in our supply chains.

This Policy is designed to:

- ensure that all individuals working for or on behalf of Kin + Carta (including its employees, directors, officers, executives, agency workers, contractors and interns (our 'Kin')) know how to spot common red flags of Modern Slavery and Child Labour to mitigate the risk of Modern Slavery or Child Labour from occurring in our operations and to support the identification and reporting of any such practices,
- reinforce our values of being connected, compassionate and courageous (our 'Values') and our expectation that any concerns be highlighted using the appropriate reporting channels, and that management is to act accordingly. Our Values provide a supportive culture through which you can be accountable for undertaking business responsibly and confidently raise concerns to help prevent human rights violations, including Modern Slavery and Child Labour in our operations and supply chains,
- provide explicit minimum standards that our clients, business partners and suppliers must follow in order to comply with this Policy, and
- demonstrate to our key stakeholders that Kin + Carta manages its human rights impacts diligently, effectively and responsibly.

Not understanding or knowing the contents of this Policy is not sufficient reason for not complying or avoiding any consequences, both under the terms of this Policy, and under the applicable law.

## 2. Scope of the Policy

This Policy is focused on the prevention of Modern Slavery and Child Labour in Kin + Carta's operations, including its supply chains.

This Policy applies to our Kin, clients, business partners and suppliers. These parties must adhere to the Policy and behave in a manner which demonstrates that all business is performed to the highest ethical standards and complies both with this Policy and all applicable laws.

This Policy will be a reference point when assessing and managing relationships with those key stakeholders.

## 3. Related Documents

This Policy supplements the principles set out in our [Code of Ethics](#).

## 4. Supply chains

We seek to support human rights through our supply chain by encouraging behaviours and practices that are aligned to our own standards and policies through our [Supplier Code of Conduct](#).

The Supplier Code of Conduct is a key due diligence mechanism that underpins our supplier selection and retention processes. It requires suppliers to confirm compliance with our mandatory requirements, which include but are not limited to:

- minimum requirements related to their treatment of people and health, safety and environmental matters;

- our expectations of how the supplier will conduct business which include compliance with all local laws and regulations in which the supplier organisation operates and with all international laws applicable to the conduct of its business, and maintaining appropriate procedures to comply with all applicable human rights and equity laws and laws prohibiting slavery, human trafficking and any form of Child Labour, and adherence to our Modern Slavery Policy; and
- the ethical standards of behaviour we expect.

As a general rule, where a supplier is unable to demonstrate that they uphold accepted employment principles, Kin + Carta should seek to undertake a thorough investigation as a condition of continued business. We should engage where we are confident that this will assist in improving the performance of suppliers whose policies or procedures relating to human rights may be incomplete or poorly implemented. In such cases, it is important to establish whether human rights are being/continue to be upheld in practice.

Kin + Carta will not knowingly do business with any organisation or body involved in Modern Slavery or Child Labour. We will terminate our relationship with suppliers, business partners and clients when their business conduct is deemed to be a violation of the Modern Slavery Act or Child Labour laws.

**The prevention, detection and reporting of Modern Slavery and Child Labour in any part of our business or supply chains is the responsibility of all Kin.**

## 5. Freedoms and Prohibited Conducts

In alignment with the ILO's Declaration on Fundamental Principles and Rights at Work, Kin + Carta is committed to upholding freedoms and taking action to prevent prohibited conducts.

### *Freedoms*

In relation to Modern Slavery, Kin + Carta respects and guarantees the following freedoms for its Kin and expects the same standards for workers in its supply chains:

- freedom of workers to terminate employment
- freedom of movement
- freedom of association and the right to collective bargaining.

### *Prohibited Conducts*

In relation to Modern Slavery, Kin + Carta expressly prohibits and condemns all forms of forced or compulsory labour and the following associated conducts:

- any threats of violence, harassment and intimidation
- use of worker (or potential workers)-paid recruitment fees
- compulsory overtime
- child labour
- discrimination
- confiscation of workers' original identification documents
- unsafe working environments.

## **6. Awareness, Training and Implementation**

Our Kin are required to attend training to facilitate the identification, mitigation and management of Modern Slavery and human rights risk across our supply chain.

Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our clients, suppliers or business partners to help them address coercive or exploitative work practices in their own business and supply chains.

The primary mechanisms of implementing this Policy are:

- the completion of the Supplier Code of Conduct by key suppliers to confirm that they comply with our mandatory requirements related to their treatment of people, health, safety and environment, and with all local laws and regulations in which the suppliers organisations operate and with all international laws applicable to the conduct of their business. Specifically, in relation to Modern Slavery they are asked to confirm that they maintain appropriate procedures to comply with all applicable human rights and equity laws, and laws prohibiting slavery, human trafficking, and any form of child labour, and that they adhere to our Modern Slavery Policy which sets out our zero tolerance policy towards any form of Modern Slavery and/or child labour.
- the acceptance of our Code of Ethics by key suppliers.
- Kin + Carta's local Human Resource and Employee Experience functions address employee matters and provide formal recruitment processes, which include pre-employment checks. For our UK based businesses, this includes processes to ensure that employees have the right to work in the United Kingdom and compliance with the National Living Wage.
- Kin + Carta only permits the use of recruitment companies with trained employees.

## 7. Breaches of this Policy

All Kin, clients, suppliers and business partners are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

If a violation of this Policy or other inappropriate conduct in relation to Modern Slavery has occurred, Kin + Carta will take remedial action, including corrective action up to and including termination of contract, as appropriate under the circumstances. If the person who breaches this Policy or has an inappropriate conduct in relation to Modern Slavery is not one of our Kin, then Kin + Carta will take whatever action is reasonable and appropriate to protect our Kin and other individuals, such as immediate termination of that relationship and, where necessary, notification of the conduct to the relevant authorities.

Kin + Carta will give its full support to anyone reporting a breach or potential breach of this Policy. Any individual raising any such concern shall be treated in full confidence, and shall not face repercussions from anyone in the business who may be affected by their reporting of suspicious behaviour.

## 8. Speaking up about breaches or potential breaches of this Policy

Kin + Carta strongly believes in the right to be heard and supported; therefore, all Kin are encouraged to raise concerns at the earliest possible stage about any actual or suspected cases of Modern Slavery or Child Labour (or that may occur in the future) or any potential malpractice or non-adherence to laws via our ["Speak Up" \(whistleblowing\) procedure](#). On page 10 of this Policy is a schedule of potential "Red Alerts" which may give rise to one of our Kin invoking this procedure. In the same way, clients, business partners and suppliers are encouraged to raise any concern by emailing [speakup@kinandcarta.com](mailto:speakup@kinandcarta.com).

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.



## 9. Remediation

We acknowledge that despite our commitment to best practices and policies, Kin + Carta may cause or contribute to an adverse human rights impacts related to Modern Slavery or Child Labour that it had not foreseen or been able to prevent. We therefore commit to provide access to remedy, compensation and justice for any victims of Modern Slavery or Child Labour where we have caused or contributed to their plight through our operations.

## 10. Compliance and oversight

This Policy may be amended from time to time. Reviews will also be carried out in order to update and address new situations that are not included in the Policy, for example, in light of the change to remote and hybrid working practices following the COVID-19 pandemic.

Each individual who is subject to this Policy is responsible for complying with it, however, the Kin + Carta Group's Statutory Directors and/or Officers are responsible for implementing its standards and enforcing them.

The Kin + Carta Group's Statutory Directors and/or Officers must ensure that the Policy is fully communicated to all Kin, clients, suppliers and business partners.

To ensure the Modern Slavery Policy is working throughout Kin + Carta, we invite our teams and our stakeholders to share feedback on how we can learn and improve as an organisation.

## 11. Contact

If you are unsure about whether a particular act, the treatment of individuals more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of Modern Slavery, or you have any questions regarding this Policy, please contact the Kin and Carta plc Company Secretary via [cosec@kinandcarta.com](mailto:cosec@kinandcarta.com).

## Schedule: Potential Alerts or “Red flags”

The following is a list of ILO indicators and possible Alerts that may arise during the course of your work or engagement which may give rise to concerns. The list is not intended to be exhaustive and is for illustrative purposes only.

If you or other Kin encounter or notice any of these “Red flags” while working for or on behalf of Kin + Carta, you must report them promptly using the procedures set out in Kin + Carta’s Speak Up Policy as they would warrant urgent investigation:

- (a) Abuse of vulnerability;
- (b) Deception;
- (c) Restriction of movement;
- (d) Isolation;
- (e) Physical and sexual violence;
- (f) Intimidation and threats;
- (g) Retention of identity documents;
- (h) Withholding of wages;
- (i) Debt bondage;
- (j) Abusive working and living conditions;
- (k) Excessive overtime.