KDM-OHS-PD-13
MODERN SLAVERY POLICY

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Issue	**Purpose of Issue/Description of changes**	**Pages/Section**	**Date**
01	1st issue	All	Feb-2021
02	Front page amended	1	Dec-2022
03	Annual review	All	Dec-2023
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05	Annual review	All	Dec-2025
06	Annual review. Clause 7 added	4	Nov-2026

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, 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 have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, based on our values and our Strategy 2030 commitment to shaping the health and sustainability of our communities and creating solutions to global challenges. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. 1.2

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our terms and conditions of business, we require compliance with this policy and the Modern Slavery Act 2015 which contains specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, (whether adults or children), and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2. APPLICATION OF THE POLICY

2.1 This policy applies to all persons working for us or on our behalf in any capacity, including (but not exclusively): employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, subcontractors, external consultants, third-party representatives, business partners and academic partners, wherever they may be located. The policy also applies to students when they are acting on behalf KDM, either in a paid or a voluntary role

3. RESPONSIBILITY FOR THE POLICY

3.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 The Chief Executive of the Board and Company Secretary, through the Procurement Manager, have primary and day to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are provided with adequate and regular communications on it and the issue of modern slavery in supply chains.

3.4 This policy will be subject to annual reviews overseen by the Board of Directors.

4. COMPLIANCE WITH THE POLICY

4.1 All employees, agency workers, seconded workers, volunteers, interns, agents, contractors, subcontractors, external consultants, third-party representatives, business partners, and partners must ensure that you read, understand and comply with this policy.

4.2 The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to a breach of this policy.

4.3 You must notify your Line Manager or if not available a Director as soon as possible if you believe or suspect that a conflict with this policy is occurring, has occurred, or may occur in the future.

4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

4.5 If you believe or suspect a breach of this policy is occurring, has occurred or that it may occur you must notify a Director or report it in accordance with our Public Disclosure (Whistleblowing) Policy and Procedure (see link in 4.3 above). You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager, or, if it is not appropriate to do so, with a Director.

4.7 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 or partner organisations. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found at in the Company's Employee Handbook.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

5.1 Raising staff awareness of the problem of modern slavery and human trafficking is a priority for KDM. KDM will ensure that a staff training plan is in place that covers all staff and targets training 3 appropriately. Specific training is required to be undertaken by our procurement professionals. In addition, communications on modern slavery will be provided as necessary to all employees.

5.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. BREACHES OF THIS POLICY

6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct.

6.2 We may terminate our relationship with other individuals, partners and organisations working on our behalf if they breach this policy.

7. REPORTING SUSPECTED MODERN SLAVERY

7.1 If you believe someone is in immediate danger call the police on 999.

7.2 If you have concerns but don't believe anyone is in immediate danger call the Modern Slavery & Exploitation Helpline on 08000 121 700