



MODERN SLAVERY STATEMENT

This statement sets out KAEFER'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 chains.

This statement relates to actions and activities during the financial year for 2019.

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 chains are 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. KAEFER in the UK are a part of the KAEFER (Group), head office based in Bremen, Germany.

> SUPPLY CHAINS

KAEFER's supply chain provides goods and services for the delivery of our industrial services of Scaffold, Insulation, Asbestos Removal and Painting. From time to time we also engage in additional services within the industrial sector. Purchasing activities for KAEFER Limited take place from the UK, with the majority of our suppliers UK based.

As part of Purchasing's approval process, all approved suppliers must agree that they can comply with KAEFER's processes and adhere to the Modern Slavery Act 2015. Suppliers are subject to audit by KAEFER Limited audit team, where suppliers will be audited against our purchasing processes including Modern Slavery Act requirements.

> 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 in its operations.

KAEFER's Modern Slavery Policy & Procedure

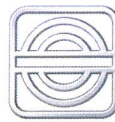
Our policy reflects KAEFER's continuing responsibility to combat slavery and human trafficking and is reviewed annually in line with our statement.

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 chains 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 Business Code of Conduct

The Code of Conduct and compliance programme sets out our policies relating to our corporate goals and values as KAEFER is strongly committed to risk management and compliance. KAEFER's Code 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 and ethical behaviour when operating abroad and 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 Local Compliance Officer is Russell Cook, Finance Director.
- > A global whistleblowing system: the KAEFER Compliance Helpline, which enables early detection and prevention of misconduct relating to corporate crime

DUE DILIGENCE

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The Company has an open and transparent process in our supply chain and as part of our initiative to identify and mitigate risk, it will ensure all those in our supply chain and contractors comply with our ethics we have in place a supply chain compliance programme which is undertaken by our Purchasing Department.

KAEFER supplier approval process requires that we:

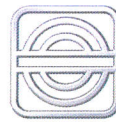
- > Identify and assess potential risk areas in our supply chains.
- > Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- > Monitor potential risk areas in our supply chains.
- > Protect whistle blowers.
- > Invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship
- > All suppliers which supply goods or services to KAEFER and have a total turnover of not less than an amount prescribed by regulations made by the Secretary of State must submit their Modern Slavery Act Statement to KAEFER Ltd for approval and;
- > All suppliers which supply goods or services to KAEFER irrespective of turnover are issued a copy or web link to the KAEFER Modern Slavery Act Statement and must sign to agree that they will comply with the Policy in any current or future trade activities with KAEFER as a condition of approval.

We have a dedicated compliance team which consists of the involvement from the following departments; Audit and Compliance to BS EN ISO 9001, 14001 & 45001 for products and services, HR, People, Purchasing and Business Development.

We are 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, the Company 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

As a business we provide various means of training and sharing of information to all our employees. This includes e-learning to employees in:

- > Business Code of Conduct
- > Anti – corruption
- > Anti Trust

We also regularly ensure that we provide awareness and training to all employees with regards to Whistleblowing and KAEFER's global whistleblowing system: the KAEFER Compliance Helpline, which enables early detection and prevention of misconduct.

In addition, we continue to raise awareness within our purchasing and procurement teams about slavery and human trafficking. Modern Slavery e-learning has been rolled out to our purchasing team and will continually be reviewed and refreshed.

EFFECTIVENESS

Our standard terms state that suppliers must comply with the Modern Slavery Act 2015 which is a mandatory requirement for all suppliers. We monitor and will continue to monitor the effectiveness of our measures through audits and will consider the introduction of appropriate KPIs.

No instances of modern slavery or human trafficking have been identified for year ending Dec 2019.

This statement was approved by the organisation's Board of Directors who review and update it annually. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking for year ending December 2019.

Executed by KAEFER Limited by Ian Tattersall, Managing Director and Russell Cook, Financial Director.

Ian Tattersall
Managing Director

Russell Cook
Financial Director