

Modern Slavery Act Statement

Introduction

Kura is a market leading provider of outsourced contact centre services and software solutions for a number of major brands across the UK.

This statement sets out Kura's actions to understand all potential modern slavery risks related to our business. We have put steps in place which are aimed at ensuring there is no slavery or human trafficking in our business and our supply chains.

In compliance with the Modern Slavery Act 2015 ("Act"), Kura offers the following statement; ***"Kura recognises that it has a responsibility to take a robust approach to slavery and human trafficking and has a zero-tolerance approach to modern slavery. We recognise that modern day slavery is a complex supply chain issue, and we work in partnership with our clients and suppliers to ensure we fully comply with the provisions of the Act"***.

Rights to Work in the UK

Kura are committed to ensuring that right to work checks are carried out consistently and diligently in line with current UK legislation. Copies of documents from List A or B of the government's right to work checklist (the official documentation that must be checked as an employer in order to prevent illegal working) are retained on employee personnel files with audits carried out to ensure that all sites are compliant with our internal procedures and regulatory requirements.

Right to work in the UK checks are supplemented by additional security checks, including satisfactory Disclosure and Barring Service (DBS) check and at least 2 years' employment reference checking prior to employment. Dependent on business stream or client requirements, further checks may also be required prior to any confirmation of employment.

Full guidance relating to the importance of all pre-employment checks is provided to the HR and Recruitment teams, along with various materials which are designed to ensure that illegal working is prevented.

All Kura employees must provide relevant right to work documentation, prior to the commencement of employment. In addition, it is a term of all employee contracts of employment that all right to work and employment vetting checks are completed to a satisfactory level, before any employment can be confirmed.

All Kura employees are given contracts of employment confirming the full terms and conditions of the employment relationship. These are given to the employee for review, then signed by both the employee and Kura, clearly stating the terms and conditions of engagement and the voluntary nature of employment. Kura employees have the freedom to leave our employment at any time

(subject to contractual notice) and any overtime in excess of standard contracted hours is also voluntary.

Working arrangements are constantly changing and Kura is regularly reviewing new working patterns as clients' and employees' requirements continue to develop.

Due Diligence

Kura undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and review is conducted in an ethical and transparent manner and operates a rigorous tender request for proposal (RFP) approach to selecting key suppliers.

Our supply chain due diligence processes includes an annual review of suppliers; including reviewing contractual arrangements and supplier code of conduct to identify how these can be further strengthened to reduce the risks across our supply chain. We will not knowingly engage with any suppliers that operate poor labour practices that breach current legislation.

We believe that the presence of slavery and human trafficking in our business and across our supply chain is a low risk given the nature of the services that Kura provides and the goods and services that Kura receives from suppliers. Our tender evaluation processes are designed to contact suppliers where we deem there could be significant risk and to establish whether suppliers can demonstrate their compliance and ongoing commitment to the legislation.

In addition, we believe that driving employee awareness and understanding of the risks of modern slavery and human trafficking will assist them in identifying and preventing exploitation.

Responsibilities

The Chief Executive Officer has overall responsibility for ensuring compliance to the Act and wider corporate responsibility.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Kura's slavery and human trafficking statement for the financial year ending June 2019.

Signed



Brian Bannatyne, CEO
November 2019

Review

It is Kura's intention to review this statement on an annual basis in line with the requirements of the Act and update on progress made to ensure full compliance.

Associated Documents

Kura has in place the following policies reflecting its commitment to acting ethically and with integrity in all its business relationships:

- Anti-Corruption & Bribery Policy
- Code of Business Conduct & Bribery Policy
- Harassment & Bullying Policy
- Equal Opportunities Policy
- Whistleblowing Policy
- Supplier Management & Purchase Order Guidelines

All documents are available on the Kura Intranet or on request from Business Standards department.

Version Control Information

Document Status: **CURRENT** / ARCHIVE / RETAINED

Storage: **LOCAL INTRANET** / OWNER LOCAL DRIVE / ARCHIVE

Keywords: Statement

Revision History

Revision Number	Author	Details	Sign Off	Release Date
1	E Steele	New Document	J McIntosh	29/10/2018
2	Summer Thandi	Annual Review	Elaine Steele	08/11/2019