

Modern Slavery Act Statement

Introduction

Kura is the Largest Independent Outsourcer in the UK, providing outsourced contact centre services and software solutions for a number of the world's most successful brands.

Together with our South Africa offshore location and in combination with our software business Inisoft, we support solutions to over 50 clients across many industry verticals.

Kura is in business because we want to help people to develop and reach their full potential. We're building a culture that shifts the mindset from focusing on "things and stuff" to "people and behaviour".

We call this process "Crossing the Bridge". Our vision is, to one day, be recognised as "Unrivalled in Developing People".

We have over circa 3000 team members who live and breathe our values of:

Vulnerability

Curiosity

Learning

Courage

Accountability

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 for slavery and human trafficking. 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".

Fair and Legal Recruitment

Kura are committed to ensuring that right to work checks are carried out consistently and diligently in line with current geographical laws and regulations.

We ensure that we recruit and select employees in a fair and lawful way, ensuring that candidates have the right to work. 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 process includes an annual review of critical 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.

Risk Management

Kura is committed to embedding effective risk management in all of our activities to protect and control the business, reduce or mitigate risk where possible and continually improve our management systems and business operating procedures.

Our Risk Management Framework seeks to provide information about how risk is assessed, managed and reviewed and how we link our corporate and business assets to identified risks. It is intended to support, inform and align with Kura's business strategies.

We are dedicated to ensuring that risks with some level of joint responsibility or accountability and those that cross departmental boundaries are managed in co-operation with the relevant departments, clients and supply chain.

Kura are ISO certified, this means that independent checks and audits have been completed by an external body. For ISO27001 & ISO9001, these audits include supplier management and recruitment policies and process checks to ensure they are operating as expected.

Continuous Improvement

Kura are committed in firming our controls to prevent slavery and human trafficking from occurring in our business and our supply chains. This will be achieved through:

- Annual review of our Policies keeping Modern Slavery in mind
- Promote awareness through our Company Intranet and new e-learning platform
- Conduct compliance reviews on recruitment and vetting in line with ISO requirements

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 2020.

Signed



Brian Bannatyne, CEO
November 2020

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
- Equality & Diversity Policy
- Whistleblowing Policy
- Recruitment Policy
- Vetting Guidelines
- Supplier Management & Purchase Order Guidelines
- Risk Management Policy

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
3	Elaine Steele	Annual Review	Kenny Rodgers	18/11/2020