

MODERN SLAVERY POLICY

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 40 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 circa 200 employees who live and breathe our 5 values;

- **Vulnerability**
- **Curiosity**
- **Courage**
- **Learning**
- **Accountability**

This document 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".

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 2022.

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.

TRAINING & AWARENESS

Kura are committed in firming our controls to prevent slavery and human trafficking from occurring in our business and our supply chains. We recognise the importance of ensuring all of our employees understand how modern slavery may manifest itself and how to report when it does. We plan to promote awareness through our Company Intranet and new e-learning platform.

KEY PERFORMANCE INDICATORS (KPIs)

This will be achieved through:

- Reassessment of Kura Policies and practices
- Assessment of recruitment and vetting in line with business and ISO requirements
- Deliver modern slavery awareness training module to all employees by June 2022
- Due diligence completed on high risk suppliers

REPORT INSTANCES OF UNETHICAL BEHAVIOR

Modern Slavery is just one issue within a broader human rights agenda and can act as a catalyst for action across wider issues. Where there are genuine concerns about possible malpractices, ill treatment or areas that may not be adequately covered by other policies and procedures, both employees and suppliers are encouraged to highlight these.

Any breach of this policy may result in Kura taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.

RESPONSIBILITIES

The Chief Executive Officer has overall responsibility for ensuring compliance to the Act and wider corporate responsibility. However, all employees and suppliers have a part to play in ensuring compliance and ethical working standards are met.

Kura did not receive any reports of instances of modern slavery or human trafficking in the financial year ending **June 2022**.

Signed



Brian Bannatyne, CEO
November 2022

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.

Next Review Date will be **November 2023**.

ASSOCIATED DOCUMENTS

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

- BS0036C Kura Counter Fraud, Bribery & Corruption Policy
- BS0030C Anti Money Laundering Policy
- BS0057C Kura Group Code of Business Conduct and Ethics
- HR0060C Harassment & Bullying Policy
- HR0048C Equality & Diversity Policy
- HR0061C Whistleblowing Policy
- HRREC0059C Kura Selection & Recruitment Policy
- HRREC0135C Kura Vetting Manual
- FINA0052C Procurement & Supplier Management
- BS0060C Kura Risk Management Group Policy

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

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3	Elaine Steele	Annual Review	Kenny Rodgers	18/11/2020
4	S Thandi	Formatted, new branding, updated section 1 & 5, 8, added section 6 & 7	Kenny Rodgers Elaine Steele	07/02/2022
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5	E Steele	Annual Review. Updates to Associated Documents	K Rodgers	30/11/2022