MODERN SLAVERY POLICY

INTRODUCTION

Modern slavery is a crime and violation of human rights, encompassing practices such as forced labour, debt bondage, human trafficking and other forms of exploitation in which individuals are coerced into work against their will. At Kura, we recognise the pervasive and complex nature of modern slavery and understand that it can occur across various sectors, geographies and stages of business operations. As such, we maintain a strict zero-tolerance approach to all forms of modern slavery and human trafficking. We are committed to conducting all aspects of our business with integrity, transparency and accountability. This policy outlines our commitment to preventing modern slavery within our organisation and across our supply chains. It also aligns with our obligations under the UK Modern Slavery Act 2015 and the Prevention and Combating of Trafficking in Persons Act 2013 (South Africa), while incorporating the latest statutory guidance issued by the UK Home Office in March 2025. Additionally, our approach is informed by international frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct.

SCOPE

This policy applies to all persons working for or on behalf of Kura, in any capacity, including employees, directors, officers, agency workers, contractors, external consultants, third-party representatives, and business partners. The policy serves as a foundation for ethical conduct and is a reference point for all decisions related to managing the risk of modern slavery.

POLICY STATEMENT & COMMITMENT

Kura is unequivocally committed to the eradication of modern slavery in all its forms. Our ethical and legal obligation compels us to actively identify, prevent, mitigate and where appropriate, remediate any instances of modern slavery that may arise within our business or supply chains. We are dedicated to embedding a culture of awareness, vigilance, and responsibility throughout our organisation. We ensure that our actions align with the six reporting areas under Section 54(5) of the UK Modern Slavery Act, which include: our organisational structure and supply chains; relevant internal policies; risk identification and management strategies; due diligence procedures; training and awareness programmes; and monitoring mechanisms to assess the effectiveness of our anti-slavery initiatives. By clearly articulating and consistently applying these principles, we aim to drive meaningful change both internally and within the wider business ecosystem.

RISK ASSESSMENT AND GOVERNANCE

We recognise that modern slavery risks vary by geography, industry, type of service, and the structure of employment and procurement practices. Accordingly, we conduct comprehensive risk assessments at least annually to evaluate the exposure of our operations and supply chains to modern slavery. These assessments consider multiple factors such as the nature of goods and services provided, supplier country risk, recruitment models and the use of temporary or low-skilled labour. The process involves desk-based research using internationally recognised indices, engagement with suppliers and stakeholders and internal audits. Oversight of these assessments lies with the Compliance Team, with active

involvement from other areas of the organisation. Senior leadership maintains strategic accountability, with high-risk findings escalated to executive management. The outcomes of these risk assessments inform our overall risk register, which is reviewed quarterly to track emerging issues and progress against mitigation strategies.

SUPPLY CHAIN MAPPING & DUE DILIGENCE

Kura is committed to maintaining transparent, ethical, and resilient supply chains. We continuously work to gain deeper insight into our supplier relationships, starting with tier 1 suppliers and progressively expanding to include tier 2 and beyond. Our approach includes the use of supplier questionnaires, audits, contract reviews and digital tools to identify potential indicators of modern slavery. We also assess our leverage within the supply chain and use this to influence ethical improvements, whether through direct engagement, capacity building or collaboration with industry initiatives. Contractual obligations related to modern slavery are included in all procurement agreements and supplier codes of conduct. Where non-compliance or indicators of exploitation are identified, we initiate a corrective action plan and, where necessary, collaborate with third-party organisations or consultants to support remediation. Disengagement is considered only when all other avenues for remediation have been exhausted, with a victim-centred approach guiding our decision-making.

POLICIES & CODE OF CONDUCT

We maintain a robust suite of internal policies that collectively support our commitment to preventing modern slavery. These include policies on ethical recruitment, which prohibit the use of worker-paid recruitment fees and ensure that all recruitment is voluntary, fair, and transparent. We uphold workers' rights to freedom of movement, freedom of association, collective bargaining, and the right to a safe and harassment-free workplace. Our policies explicitly prohibit child labour, discrimination and the confiscation of identity documents. In addition, our whistleblowing policy provides confidential and secure reporting channels, including anonymous options accessible 24/7. All relevant policies are reviewed periodically and communicated to staff and suppliers. We monitor implementation through compliance checks, audits and engagement forums.

REPORTING, WHISTLEBLOWING & REMEDIATION

Kura encourages all employees, suppliers and stakeholders to speak up about any concerns related to modern slavery or human rights violations. We maintain a secure, anonymous whistleblowing mechanism that is easily accessible in our geographic operating locations. All reports are treated confidentially, investigated promptly and managed with the utmost sensitivity to the welfare of individuals involved. In instances where modern slavery is identified, we follow a structured remediation process that prioritises victim safety, access to justice and reintegration support. This includes working with NGOs, government agencies, or support services where necessary. Kura has documented procedures for supplier engagement and corrective actions, including how findings are tracked, escalated, and addressed to prevent reoccurrence. Lessons learned are shared internally and used to improve our systems.

TRAINING & COMMUNICATION

Raising awareness and equipping our teams with the knowledge to detect and prevent modern slavery is essential. All employees receive training on this policy as part of the onboarding process. Annual refresher training is provided to ensure continued awareness and capability. Training content includes recognising signs of exploitation, understanding legal obligations, and knowing how to escalate concerns. Communications about our anti-slavery commitments are shared company-wide and embedded in our culture through team briefings, policy updates and supplier communications.

MONITORING, REVIEW& CONTINUOUS IMPROVEMENT

We regularly monitor the effectiveness of our approach to modern slavery through internal audits, supplier performance evaluations and analysis of key performance indicators. We report annually through our Modern Slavery Statement, which reflects our progress and sets out our goals for the year ahead. The statement is approved by Kura's leadership team and published on our website in compliance with Section 54 of the Modern Slavery Act. Continuous improvement is embedded in our culture; we seek to improve year-on-year and benchmark our activities against emerging best practices and sector-specific developments. We also participate in multi-stakeholder initiatives, industry forums and knowledge exchanges to refine our approach and increase our collective impact.

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7	Cameron Vishnu	Policy updated based on new statutory guidance on section 54 of the Modern Slavery Act 2015	K Rodgers	