



Kershaw Group Limited and its subsidiary companies including
Kershaw Mechanical Services Limited, TR Freeman Limited and
DigiCollab Limited

Modern Slavery and Human Trafficking Policy

1. Policy Statement

- 1.1 Kershaw Group Limited and its subsidiary companies (The Company) is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chain or sub-contract partners.
- 1.2 Modern Slavery is a crime and a gross violation of fundamental human rights which can take a variety of forms including slavery, forced labour, servitude and human trafficking and exploitation for personal or commercial gain.
- 1.3 The Company has a zero tolerance approach to modern slavery and acknowledges responsibility to the Modern Slavery Act 2015. The Company have established effective systems and controls to ensure transparency within the organisation and with our suppliers of goods and services that make up the company supply chain.
- 1.4 The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

2. Responsibility for the Policy

- 2.1 The Company Directors and senior management have overall responsibility for implementing this policy and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within the supply chain.
- 2.2 The Group HR Director, IMS Compliance Manager and Group Managing Director will work together to ensure that this policy is maintained across all operational areas of the Group in accordance with evolving regulatory requirements and internal auditing processes, whilst addressing any breaches or concerns.

3. Compliance with the Policy

- 3.1 All persons working for Kershaw Group and its subsidiaries must ensure they have read, understood and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of those working for us or under our control. All persons working for Kershaw are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 All persons working for Kershaw are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain at the earliest



possible stage by reporting it in accordance with our Grievance Procedure (Detailed in section 13 of the Company Handbook).

- 3.4 As part of the companies' due diligence processes into slavery and human trafficking, the supplier and sub-contractor approval process will incorporate a review of the controls undertaken by that third party organisation. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.
- 3.5 This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007.
- 3.6 The implementation and operation of this management system underlines our commitment to this policy.
- 3.7 Breaches of this policy will generally be treated as gross misconduct and will follow Company disciplinary procedures which may result in dismissal without notice.
- 3.8 We reserve the right to terminate our relationship with individuals and organisations working on our behalf if they do not comply with this policy.

4. Communication and Awareness of this Policy

- 4.1 This policy will be communicated to all Kershaw employees and available to view on the [Kershaw Wiki](#).
- 4.2 Kershaw employees are required to communicate our zero tolerance approach to modern slavery to all suppliers, contractors and business partners at the onset of our business relationship with them and reinforce our approach as appropriate thereafter.
- 4.3 This policy will be reviewed annually and published on our website.

This policy has been approved & authorised by:

Name: Ian Greenstock
Position: Kershaw Group Managing Director
Date: 1st July 2019
Signature:

A handwritten signature in black ink, appearing to read 'Ian Greenstock', written over a light blue circular stamp.