



Modern Slavery and Human Trafficking Policy



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1 Introduction

Kao Data considers this an extremely important issue, and we aspire to go above and beyond the requirements of the Modern Slavery Act 2015, embedding the responsibility to respect human rights into our company culture.

2 Purpose

Kao Data is wholly committed to setting the highest ethical standards and implementing practices that serve to combat both modern slavery and human trafficking. To that end, Integrity and transparency are of the utmost importance to us, and we take an absolute zero tolerance attitude towards unethical practices of any kind, whether committed by employees or by third parties acting for or on behalf of Kao Data.

We commit to regularly reviewing our business practices to ensure that we adopt the best anti-modern slavery and human trafficking processes for our business. We endeavour to demonstrate our approach to tackling modern slavery and human trafficking to our customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

3 Applicability

This policy is applicable to all stakeholders, employees, contractors, and third-party suppliers working for or on behalf of Kao Data.

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4 What constitutes Modern Day Slavery and Human Trafficking?

4.1 Modern Slavery, servitude and forced or compulsory labour:

- (a) a person commits an offence if they hold another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- (b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

The references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention. The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

4.2 Human Trafficking:

- (a) A person commits an offence if the person arranges or facilitates the travel of "another person" with a view to "that person" being exploited.
- (b) It is irrelevant whether "the person" consents to the travel (and whether they are an adult or a child).
- (c) A person may arrange or facilitate "another person's" travel by recruiting "the person", transporting or transferring "the person", harbouring or receiving "the person", or transferring or exchanging control over "the person".
- (d) A person arranges or facilitates "the other person's" travel with a view to "that person" being exploited if:
 - they intend to exploit "the person" (in any part of the world) during or after the travel, or
 - they know, or ought to know, that the transferee is likely to exploit "the person" (in any part of the world) during or after the travel.

5 Our Policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains, or in any part of our business. Our Anti-slavery Policies reflect our commitment to acting ethically and with integrity, in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

6 Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we aim to ensure systems are in place to:

- Identify and assess any potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

7 Supplier adherence to our Business values and ethics

To ensure all those in our supply chain and contractors comply with our values we review our supply chain and contractors on a periodic basis. We have dedicated Compliance and Human Resource functions to enable this approach as well as a Supplier Code of Conduct Policy.

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8 Training

We commit to communicating this policy statement to all employees, clients, agents, contractors, and suppliers, to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

9 Employee Responsibilities

All staff must ensure that they read, understand, and comply with this policy.

10 How to Raise a Concern

All members of staff, suppliers and contractors are encouraged to raise concerns about any issue or concern relating to slavery or human trafficking at the earliest possible stage. If any member of staff has any query in relation these matters, they should raise their concern to their line manager. They must notify their line manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Staff are reminded of the Company's Whistleblowing Policy which is available in the Employee Handbook.

11 Our effectiveness in combating Modern Slavery and Human Trafficking

We believe that slavery and human trafficking is not taking place in any part of our business or supply chains. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, has been approved and constitutes Kao Data's slavery and human trafficking statement.

12 Changes to this Policy

We reserve the right to amend or modify this Policy without notice to you and if we do so we will post the changes on this page. It is your responsibility to check our Policy each time before you access our website for any changes.

15 Sign off

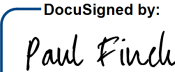
Signed

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Lee Myall
 Chief Executive Officer, Kao Data
 Published: August 2023

Signed

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