

# Connected\_\_Kerb

Connected Kerb Ltd

The Tapestry Building

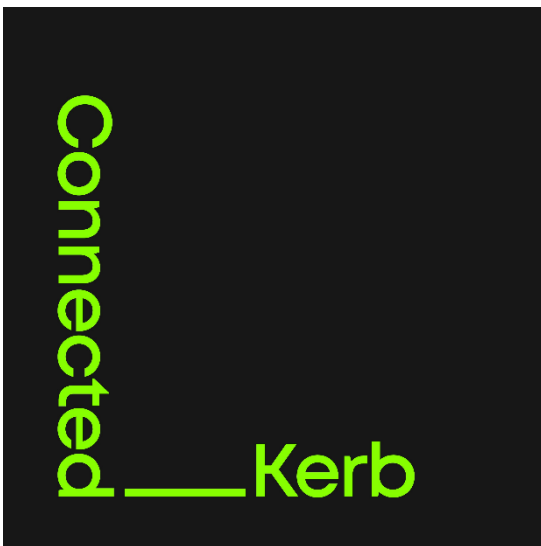
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## MODERN SLAVERY POLICY



## 1. Introduction

Connected Kerb Limited (Connected Kerb) has a zero-tolerance approach to modern slavery and is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chain, and imposes those same high standards on its contractors, suppliers and other business partners.

### 1.1 Related policies:

- Whistleblowing
- EDI
- Recruitment and selection
- Grievance procedure

### 1.2 Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

We all have responsibilities to ensure our colleagues and fellow workers are safeguarded, treated fairly and with dignity.

Connected Kerb's Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. . The senior leadership and management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it via the iHasco training system. The People and Culture Team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

This policy does not form part of any employee's contract of employment. Connected Kerb shall review this Policy regularly and otherwise as required in order to ensure that it remains up-to-date and fit for purpose. All questions, concerns, and other feedback relating to this Policy should be communicated to the group senior management team.

Updating this policy is the responsibility of the CPO. It will be regularly reviewed.

Revision	Selection Reference	Amendment	Date of revision
First issue			03/01/21
Second issue	Complete policy update	Complete policy update	11/8/23

## 2. Purpose and aims of the policy

2.1 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Modern slavery is a crime and a violation of fundamental human rights. The UK's Modern Slavery Act 2015 (the Act) covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.

2.2 The purpose of this policy is to support international efforts against modern slavery.

2.3 Connected Kerb is committed to the elimination of all forms of modern slavery and has a zero-tolerance approach to it.

2.4 Tackling Modern Slavery requires all of us to play a part. Connected Kerb faces risks related to modern slavery in our manufacturers, partnerships, supply chains and recruitment.

2.5 As an equal opportunities' employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our employees. We want all our employees to feel confident that they can expose wrongdoing without any risk to themselves

2.6 Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the entity where we employ them and to safeguard employees from any abuse or coercion.

2.7 We do not enter into business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

## 3. How is Modern Slavery relevant to us?

3.1 We recognise our statutory obligations, and we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

3.2 With this in mind, we need to pay particularly close attention to:

- The suppliers we use and how they deal with their suppliers
- Cleaning, maintenance and catering suppliers, especially those using casual labour
- Corporate hospitality

- Recruiting through agencies, short term workers, temporary engagements and general recruitment.

## 4. Policy

Connected Kerb expects everyone working with us or on our behalf (i.e. all employees and agents) to support and uphold the following measures to safeguard against modern slavery. If we find that other individuals or organizations working on our behalf (such as suppliers, contractors, and consultants) have breached this policy, we will ensure that we take appropriate action. This may range from considering whether breaches can be re-mediated if that might represent the best outcome for those individuals impacted, to terminating such relationships.

As an organisation we will:

- maintain clear policies and procedures prohibiting and preventing modern slavery, and protecting our workforce and reputation
- be clear about our recruitment
- check our supply chains
- lead by example by making appropriate checks on all employees, volunteers, recruitment agencies, suppliers, etc to ensure we know who is working for us
- ensure we have in place an open and transparent grievance process for all employees
- seek to raise awareness so that our colleagues know what we are doing to promote their welfare

Managers are expected to:

- listen and be approachable to colleagues
- respond appropriately if they are told something that might indicate a colleague, or any other person, is in an exploitative situation
- remain alert to indicators of slavery
- raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- use their experience and professional judgement to gauge situations

Employees are expected to:

- keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting
- follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated {tell us if you think there is more we can do to prevent people from being exploited.

## 5. Communication and awareness of this policy

This policy forms part of our employee handbook. Training on this policy, and the risk our business faces from modern slavery in its supply chains, forms part of the onboarding training for all individuals who work for us and must be completed within the first two weeks of employment. Further training can be provided if necessary. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 5.1 Procedure

### Duty to comply

Hiring managers, line managers and supervisors will ensure that employees and agents have read, understood, and comply with this policy. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us. Everyone is required to avoid any activity that might lead to, or suggest, a breach of this policy.

### Identifying

Vulnerability to modern slavery is affected by factors related to the presence or absence of protection and respect for rights, physical safety and security, access to the necessities of life such as food, water and health care, and patterns of migration, displacement, and conflict<sup>1</sup>. These factors can impede the ability to identify confidently victims of modern slavery. There may also be situations of self-identification as a victim of modern slavery and guidance on this is available through the UK's [Home Office website](#).

Slavery is often hidden and can be difficult to identify, but there are signs which, if appearing together and taken in broader context, might mean that someone is in slavery<sup>2</sup>. The following signs could indicate that someone may be a slavery or trafficking victim:

- the person is not in possession of their own passport, identification, or travel documents
- the person is acting as though they are being instructed or coached by someone else
- The person allows others to speak for them when spoken to directly
- they are dropped off and collected from work
- the person is withdrawn, or they appear frightened
- the person does not seem to be able to contact friends or family freely
- the person has limited social interaction or contact with people outside their immediate environment

This list is not exhaustive. A person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. A picture might be built up of the person's circumstances which may indicate something is not quite right.

### Reporting

#### a) Raising a concern

If you think that someone is in immediate danger, call the police. Talking to someone about your concerns may stop someone else from being exploited or abused. However, not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first before taking any further action.

If you have a concern, you should inform your line manager of your concerns and contact the CPO.

#### b) Discussing your concern

The CPO will arrange a meeting with you to discuss your concern and keep you informed of progress (where legally appropriate). If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern

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<sup>1</sup> Global Slavery Index: [Global Slavery Index | Walk Free](#)

<sup>2</sup> Anti Slavery International, FAQs: [Anti-Slavery International - FAQs \(antislavery.org\)](#)

slavery, raise it with your manager and the CPO. Any employee who, in good faith, raises concerns that turn out to be unfounded will not be penalised for being genuinely mistaken

c) Investigation and outcome

Depending on the nature of the concern an initial assessment will be carried out. There may be circumstances when external authorities may need to become involved, including the police or another independent body. If we consider this is necessary, Connected Kerb reserves the right to make such a referral without the reporting employee's consent (though we will only voluntarily share the reporting employee's personal data with external authorities with the reporting employee's consent). At the end of any investigation you:

- May be informed of the outcome within the boundaries of the law and confidentiality
- Will be expected to keep information associated with the matter confidential
- Can request that your identity remain confidential
- May be informed of the action Connected Kerb decides to take.

Depending on the outcome, an appropriate report will be submitted to the Board

d) Protection of disclosing employees

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith a suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Any report you make will be treated in accordance with our Whistleblowing Policy.

## 6 Recruitment

We have robust recruitment practices that attempt to minimise the risk of engaging employees or workers who have been implicated in modern slavery or who may pose a risk to those vulnerable to modern slavery. Any agencies used should be asked to supply an up-to-date copy of their Anti-Slavery Policy and to confirm they make the appropriate checks on the person they are supplying.

All successful candidates are required to provide proof of identity. All successful candidates are provided with a copy of our employees handbook and policies. All employees are required to acknowledge that they have been made aware of, read, and understood and will abide by and act in accordance with key policies. We always ensure

- all employees have a written contract of employment
- our employees are legally able to work in the UK
- the names and addresses of our employees are filed safely on our employee database (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited)
- We provide information to all new employees on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to
- If we suspect someone is being exploited, our reporting procedures will be followed.

## 7 Working with suppliers

We are not prepared to accept any form of exploitation by the companies we do business with. We will ensure that where practicable new supplier contracts we enter into contain an anti-slavery clause. This clause prohibits suppliers and their employees from engaging in slavery or human trafficking.

As part of our due diligence in respect of partners for the delivery projects, all partners are asked if they have a Modern Slavery Policy and they are expected to comply with their relevant policies.

## 8 Confidentiality

We hope that our employees will feel able to voice modern slavery concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, this will be discussed with you. Some challenges can be overcome by using telephone appointments or through an anonymised email address. We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you or feedback to you. It is also more difficult to establish whether any allegations are credible. Employees who are concerned about possible reprisals if their identity is revealed should inform the CPO and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from our EAP. Any personal information you provide will be retained for as long as is necessary to investigate and resolve the issue, including putting right any shortcomings discovered and any litigation. We may retain it for longer if it is required to meet legal, regulatory, or contractual obligations but your personal data will be deleted as soon as is required by law.

## 9 Escalation and support

If you need support with this process, please talk first to your line manager and then to your people Partner. A list of useful contacts is below:

CPO	<a href="mailto:cecilia.amis@connectedkerb.co.uk">cecilia.amis@connectedkerb.co.uk</a>
Counter Fraud and Whistleblowing Unit (CFWU)	<a href="mailto:reportingconcerns@dfid.gov.uk">reportingconcerns@dfid.gov.uk</a> or +44 (0)1355 843747
Modern Slavery Helpline	0800 0121 700 or <a href="#">form</a>
Child Trafficking Advice Centre (CTAC), part of the National Society for the Prevention of Cruelty to Children (NSPCC)	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> or 0808 800 5000
We Care - Employee Assistance Programme (EAP)	You can access WeCare by visiting <a href="http://www.wecare-cl.com">www.wecare-cl.com</a> On the login page click 'Create Your Account' and add the access code E31150 when you've added your details.