

## MODERN SLAVERY STATEMENT 2021

### PURPOSE

This statement is for the year ending 31 December 2020 and has been published in accordance with Section 54 of the Modern Slavery Act 2015.

The purpose of this statement is to set out the steps taken by the Kelly group of companies (including Kelly Communications Group Limited; Kelly Communications Enterprises Limited; Kelly Communications Trading Group Limited; Kelly Communications Limited; Kelly Comms Limited; Kelly Civils Limited; Kelly Technical Services Limited; Kelly Traffic Management Limited; Kelly Fleet Services Limited; and Kelly Rail U.K. Limited) (the “Kelly Group”) to prevent modern slavery and human trafficking within our business and supply chain.

### INTRODUCTION

We are one of the UK’s leading national telecommunications and utilities service providers, operating in industries as diverse as telecommunications; rail; metro; highways; civils; utilities; fleet; and traffic management.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Kelly Group has a zero tolerance approach to any form of modern slavery within our operations or supply chain. We seek excellence in every aspect of our business and are committed to the highest standards of professionalism, ethics and integrity and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

### OUR SUPPLY CHAIN RELATIONSHIPS

Our key suppliers are the businesses which help us to run our premises, such as our cleaning and security providers, and the businesses which supply us with the technology, products and resources to deliver our services to our clients. We tend to foster long-term relationships with these first-tier suppliers and we avoid making demands of our suppliers that might lead to them violating human rights.

In addition, a proportion of our revenue is spent on subcontractors and materials required to provide our services to our clients. We have relationships with a number of subcontractors and everyday a number of their workers will be working on our sites, in addition to our own staff.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We remain fully 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 statement and our internal 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.

Our internal policies include our *No Forced or Bonded Labour Policy* where we confirm that we will not tolerate or condone the use of any type of forced or bonded labour within any part of our business or supply chain and will take seriously any allegations that the policy has not been followed or breached. We also operate a *Whistleblowing Policy*, which continues to record the right of any person to raise concerns about any perceived wrongdoing or breach of law, including, any human rights violation like modern slavery and human trafficking. All reports will be fully investigated and appropriate remedial actions taken.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

Kelly Group operates a supplier and subcontractor policy and maintains a preferred supplier and subcontractor list. When selecting our suppliers and subcontractors, price is not our only driver. We are committed to buying quality products and services from ethical suppliers and subcontractors and part of measuring this involves assessing the approach a potential supplier or subcontractor takes to its people and the workers in its own supply chain.

As part of our initiative to identify and mitigate risks to workers in our supply chain, we have continued to:

- undertake due diligence on all new suppliers and subcontractors before allowing them to become a preferred supplier or subcontractor;
- regularly review existing suppliers and subcontractors; and
- assess our supply contracts by size and risk profile as part of our existing procurement processes and to consider the risk of slavery or trafficking being present.

Other steps we continue to take include:

- an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery;
- evaluating the modern slavery and human trafficking risks of each new supplier or subcontractor via pre-qualification questionnaire; obtaining Modern Slavery Statements from our suppliers and subcontractors (where applicable) and any other policies and procedures they have;
- ensuring that all internal processes are being adhered to for example ensuring that personnel provided by suppliers or subcontractors have the right to work in the UK, ensuring that limited company subcontractors are paid into verified company bank accounts and ensuring that suppliers of personnel do not use off-shore payment solutions; and
- conducting on-site supplier and subcontractor audits.

We also have in place systems to:

- identify and assess 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; and
- protect whistle blowers.

Our suppliers and subcontractors are encouraged to report any concerns that slavery human trafficking may be, or is, taking place. Our standard procurement processes include a variety of checks and reviews designed to ensure that the suppliers and subcontractors we engage with have sufficient capability, capacity, and agreement to Kelly Group's policies and commercial terms.

We are aware that risks arising from modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, subcontractors or suppliers. As such, we expect our suppliers and subcontractors to ensure that there is no slavery or human trafficking in their supply chain. If any issues are identified that are not resolved to our satisfaction, we will view the on-going relationship with the relevant organisation.

We also have a dedicated compliance team, which consists of involvement from the following departments:

- Legal;
- Audit and compliance;
- Health and Safety;
- Human resources; and
- Procurement

#### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff on how to evaluate suppliers and mitigate risks within supply chains. Our aim is to raise awareness of the issues and increase informed scrutiny. We also actively encourage our staff to report their concerns through their line manager, or any member of the management team.

#### **FURTHER STEPS**

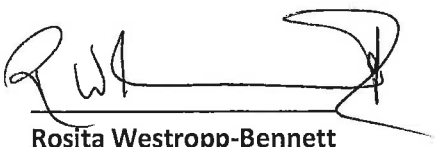
We understand that modern slavery and human trafficking is not static, and will continue to assess our approach to mitigating this risk in the year ahead and monitor the effectiveness of our actions against modern slavery and human trafficking.

In order to assess the effectiveness of the measures taken by Kelly Group we will be reviewing the following key performance indicators:

- Staff training levels;
- Ongoing supplier engagement and awareness;
- Actions taken to strengthen supply chain auditing and verification;
- Assessing suppliers ability to detect and mitigate modern slavery risk in supply chains; and
- Investigations undertaken into reports of modern slavery and remedial actions taken in response.

We will also continue to develop further standards to support our anti-slavery and human trafficking policy (and related policies). We will keep our supplier and subcontractor policy for the appointment of new suppliers and subcontractors under review, ensure that our workforce continue to receive appropriate training on identifying any potential unlawful or unethical conduct within our operations an supply chain and continue to assess the risks associated with our existing supply chain.

This Statement was approved on 26 March 2021 by the Board of Kelly Communications Group Limited; Kelly Communications Enterprises Limited; Kelly Communications Trading Group Limited; Kelly Communications Limited; Kelly Comms Limited; Kelly Civils Limited; Kelly Technical Services Limited; Kelly Traffic Management Limited; Kelly Fleet Services Limited; and Kelly Rail U.K. Limited.



**Rosita Westropp-Bennett**  
Vice Chair & Finance Director

26<sup>th</sup> March 2021