



Anti-Slavery and Anti-Human Trafficking Policy

IMS-HRM-023

Strictly Confidential

Revision	Prepared By:	Reviewed by:	Approved by:	Date
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1. Organisational Structure, Business and Supply Chains

The KN Group is a leading provider of infrastructure support services to the utility and telecommunications sector and consists of a number of companies and supply chains including contractors, sub-contractors and suppliers.

The organisation currently operates in the following countries:

- Ireland
- United Kingdom
- Caribbean

The KN Group's supply chain is primarily based in Ireland and the UK and a number of our clients supply materials directly or on a Kanban free issue basis.

2. Company Policies

We strive to continuously develop our organisation's commitment to combat Modern Slavery and Human Trafficking, in this regard we have implemented the following policies:

KN Group ensures that all business units and associated suppliers within our supply chain are aware of the Company's policy and outline their obligations.

In addition, the Company has a policy with effective mechanisms in place to elicit any concerns pertaining to slavery or human trafficking within our business or supply chain.

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 and Human Trafficking Policy clearly states that we will not tolerate any form of forced labour or child labour in our supply chain or in any aspect of our operations.
- We are committed to ensuring that we act ethically and with integrity in all our business relationships which is clearly set-out in our Anti-Bribery and Anti-Corruption policy document.

3. Risk Assessment and Due Diligence Process

We are also developing a system of supplier audits which will facilitate greater scrutiny of our supply chain and which will ensure that our suppliers adopt preventions to Anti-Slavery and Human Trafficking.

Outlined below are risk based and take into consideration the level of risk identified. In this regard, we have identified and are implementing the following risk assessments approach:

- Procurement supply chain review and risk assessment to identify areas of high risk within our supply chain with regard to Modern Slavery and Human Trafficking
- A due diligence process that asks specific questions relating to Modern Slavery and Human Trafficking during the pre-qualification of our sub-contractors.
- This due diligence process also concluded the need for continuous assessment with regard to the above process to ensure continued compliance is being achieved and to monitor the effectiveness of this process.
- Again this same process highlighted the need to ask these same questions of all suppliers who through the supply chain review and risk assessment are deemed to be high risk in regards to Modern Slavery and Human Trafficking
- We are committing to twice yearly audits of a number of randomly selected suppliers from the entire supply chain.

4. Departmental Training

The Procurement Department has been briefed to ensure that our key employees within our supply chain activities have a thorough understanding of Modern Slavery and Human Trafficking Act, in particular where it is most likely to exist and how it could impact the KN Group.

5. FURTHER INFORMATION

For further information and guidance managers should contact an HR Adviser.