

# Charles Kendall Group Modern Slavery and Human Trafficking Statement

## Introduction

Charles Kendall Group's (CKG) Modern Slavery and Human Trafficking Statement (the Statement) has been published in accordance with the Modern Slavery Act 2015. It sets out the steps that CKG, including all its subsidiaries, has taken to prevent Modern Slavery between 01 January and 31 December 2020 (CKG's Financial Year).

CKG is committed to upholding the highest ethical and professional standards and practices. Modern Slavery is both an extremely serious crime and a grave violation of human rights and human dignity and we take a Zero Tolerance Approach to Modern Slavery within our business and our supply chains.

## Statement Definitions

**Personnel:** Individuals carrying out work on behalf of an organisation. For the purposes of this Statement they include but are not limited to employees (paid or unpaid), contractors, consultants, Board members and interns.

**CKG Supplier:** A Supplier that provides goods, services and/or otherwise acts on CKG's behalf, or with whom CKG enters into a contract with 'for and on behalf of' a third party. A CKG Supplier may also be referred to as a contractor, a subcontractor, a consultant, a vendor or a service provider. For the purposes of this statement, CKG Suppliers also encompasses affiliates, agents and partners when acting on the CKG Supplier's behalf.

**Modern Slavery:** The deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It encompasses slavery, servitude, forced and compulsory labour, child slavery, early and forced marriage, and human trafficking (the arranging or facilitating of travel of a person with the intent to exploit them).

**Zero Tolerance Approach:** The approach is applied without any exception and regardless of extenuating or mitigating factors, except for established legal defences.

## CKG's Structure, Business and Supply Chains

CKG is an end-to-end supply chain management group working with Governments, their organisations and private sector businesses. It is a limited company with its main Head Office located in the UK, and subsidiary companies registered in the UK, Australia, China, Dubai, France, Germany, Hong Kong, Italy, Oman, Romania and the USA. Our subsidiaries provide technical procurement, procurement consulting, freight, packing, event logistics, product logistics, and travel and events services. CKG work with suppliers and clients globally. These occasionally include countries where, according to the Global Slavery Index, Modern Slavery is currently prevalent.

## CKG's Policies in Relation to Modern Slavery and Human Trafficking

### CKG's Business

CKG's internal Modern Slavery and Human Trafficking Policy (the Policy) was drafted in 2016. The Policy communicates our Zero Tolerance Approach to Modern Slavery to all Personnel. The Policy sets out CKG's commitment to ensuring that efficient and effective systems, procedures and internal controls are implemented and enforced to enable the prevention and detection of Modern Slavery within our business or our supply chains, vigorously investigating all instances of suspected Modern Slavery within our business or our supply chains, assisting the police and other law enforcement bodies in the investigation and prosecution of suspected Modern Slavery within our business or our supply chains.

The CKG Board holds overall responsibility for ensuring that the Policy complies with CKG's legal and ethical obligations and that those under its control comply with it. CKG's Chairman holds primary responsibility for the implementation, monitoring and review of the Policy, while CKG's HR Manager is responsible for delivering introductory training on the Policy as part of the induction process for all new CKG Personnel, and providing all existing CKG Personnel with regular training updates on their adherence to it. All CKG Personnel are required to be fully conversant with the provisions of the Policy and are expected to adhere to them at all times. Any CKG Personnel who breach this policy face disciplinary action which could result in dismissal for gross misconduct or the termination of their contractual relationship with CKG.

The CKG Whistle Blowing Policy sets out the mechanisms for reporting malpractice and misconduct related to the business and supply chains.

### **CKG's Supply Chain**

CKG's external Supplier Code of Conduct (the Code) was drafted in 2016 and renewed and updated if necessary on an annual basis. The Code communicates our Zero Tolerance Approach to Modern Slavery to all CKG Suppliers. The Code requires CKG Suppliers to ensure that their Personnel are employed voluntarily and not forced into labour, that their contracts clearly convey the conditions of employment in a language understood by their Personnel, that they do not withhold the original government-issued identification and travel documents of their Personnel, that they pay their Personnel a fair and reasonable wage, and that they notify CKG immediately if a Modern Slavery concern is identified in relation to work carried out for CKG by their Personnel, and/or the individuals and organisations that comprise their supply chain. The Code also requires CKG Suppliers to provide an anonymous complaint mechanism for their Personnel to report reporting malpractice and misconduct related to their business and their supply chains, and to protect whistle blower confidentiality and prohibit retaliation.

The Code is published on CKG's website and is referred to in our contractual Terms and Conditions.

### **CKG's Due Diligence & Risk Assessment Processes in Relation to Slavery and Human Trafficking**

In order to better identify and mitigate the risk of Modern Slavery within our business and our suppliers, CKG intends to conduct an internal review of key CKG Suppliers. This review will be designed to assess whether each CKG Supplier is located in a country with a high prevalence of Modern Slavery, whether the goods or services that it provides are manufactured or provided in a country with a high prevalence of Modern Slavery, and whether the goods and services provided are from industries with a high prevalence of Modern Slavery. If any of our key CKG Suppliers are identified as at high risk we will ask them to confirm the steps that they have taken to manage this. This review is expected to take place later in 2020.

This statement was approved by the CKG Board and is signed by:



MM Kendall  
Chairman  
22 January 2020