Statement - KMS (UK) Ltd and the Modern Slavery Act (2015)

Introduction

Section 54 of the Modern Slavery Act (2015) requires organisations that supply goods or services and have a consolidated global turnover of £36 million per annum or more to prepare a slavery and human trafficking statement (a 'Statement') for each financial year.

Although the revenues of KMS (UK) Ltd do not currently exceed £36 million per annum, we feel it is part of our moral responsibility to further our commitment to respecting the fundamental human principles and rights within our workplace.

Our policy

As a highly reputable and well established brand that has become synonymous with its sound ethical values, KMS endeavours to enforce the appropriate arrangements and practices necessary to ensure the welfare of our workforce is to a high and ethical standard.

We adopt a zero-tolerance to slavery and human trafficking, and KMS (UK) Ltd prohibits all forms of forced or compulsory labour.

Our policy is to assess and address the risks of violations of anti-human trafficking and anti-modern slavery laws. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the legislation.

Our belief system with respect to the hiring of migrants is very tightly tied with the teachings of the Dhaka Principles. The principles offer core values on the treatment of a migrant from the beginning of their employment period, and are a system built upon respect for your employees.

Employment

KMS understand the potential risks faced by a migrant worker and consider it our responsibility to help assist any employee to mitigate such risks. Actions taken by KMS include:

- A simple but robust registration and recruitment system with no fees incurred by the employee

Proprietor: KMS (UK) Ltd. Limited company registered in England and Wales. Registered number: 03545205.

- Full compliance and enforcement of UK and EU labour laws on behalf of the workforce
- Written contracts of employment which are clear, with no punitive clauses including penalties for early termination of their contract of employment
- Accurate and consistent payroll paid directly to the employee in a manner of their choosing
- Production of a payslip clearly showing all pay elements and hours worked
- Payment consistent with or above market rates
- No deductions made which infringe upon the payment of the Living Wage (other than statutory attachment of earnings orders issued by a UK court)
- No retention of any employee documents or other valuables
- Secure storage of employee data in accordance with GDPR regulations
- Possession of the relevant linguistic and communication skills to overcome any potential language barriers

Transparency in our supply chains

We recognise that all businesses are exposed to greater risk when dealing with its suppliers, particularly those who have operations/suppliers in other territories. We have examined our supply chains for the financial year 2017-18. Of these, 100% are located within the UK or other low risk countries.

Nevertheless, KMS (UK) Ltd does not remain complacent, and we retain a commitment to collaborate closely with suppliers to help them understand and work towards their own obligations under the Modern Slavery Act. This also includes ongoing scrutiny to ensure whether a supplier has been convicted or had a notice served upon them for infringement of The Modern Slavery Act 2015.

Future Steps:

We we will continue to strengthen our approach to managing the risk of Modern Day Slavery within our business. This includes:

- Further training on modern slavery risks to our procurement and supplier management colleagues
- Strengthening our due diligence process for any suppliers outside of the UK and other low risk countries
- Review and revise our policies and processes to include express reference to the Act.

This statement will be reviewed annually and is signed on behalf of KMS (UK) Ltd in the United Kingdom.

Clive Gates
Director
KMS (UK) Ltd
27 December 2025