



A POLICY TO COMBAT THE POTENTIAL FOR SLAVERY PRACTICES TO EXIST IN MODERN DAY SUPPLY CHAINS

1) Introduction

Modern slavery is a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company can be at risk of being involved in this crime through its own operations and its supply chain.

At The Kelly Foundation, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our own operation and in our supply chain. We have and will continue to take steps to tackle modern slavery, as outlined in this policy.

2) Our business and supply chains

The Kelly Foundation is a mental health support charity with aspirations to grow and develop the services we can provide to our clients. Whilst our purchases are presently limited, in the future, as we develop a therapeutic support café proposal, the food supply chain will have potential to see exploitation in its different stages.

We will establish a relationship of trust and integrity with all our suppliers, which will be built upon mutually beneficial factors. Our supplier selection will include due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We will ensure any allegations of human trafficking/slavery activities against any of our suppliers, are immediately reported to the relevant authority.

3) Policies

The Kelly Foundation has adopted the following policies for identifying and preventing slavery and human trafficking in any of our present or future operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.
- Purchasing Code - our supplier contracts will make explicit reference to slavery and human trafficking.

4) Supplier due diligence

The Kelly Foundation will conduct due diligence on new suppliers and existing suppliers at intervals which includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, employee relations and employee contracts
- Requiring improvements to substandard employment practices
- Eliminating suppliers that fail to improve their performance in line with our requirements

We will require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

5) Training

In addition to the awareness programme The Kelly Foundation will provide e-learning to all employees and supplier contacts, which covers:

- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What steps The Kelly Foundation will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by our anti-slavery policy

6) Measure how we're performing

The Kelly Foundation will progressively introduce a set of key performance indicators to combat modern slavery and human trafficking in our supply chain which will include:

- How many suppliers have filled out our ethics questionnaire?
- How many suppliers hold awareness training equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

This statement has been approved by the board of Trustees of The Kelly Foundation at its board meeting on 14th April 2023.

Agreed on behalf of the Trustees

John Stooke

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Chairman

The Kelly Foundation

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