

Modern slavery statement pursuant to section 54 of the Modern Slavery Act 2015



Anti-Slavery Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Kepler has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to dealing with our responsibility to eradicate modern slavery throughout our supply chains.

We expect the same high standards from all of our contractors, suppliers and other business partners and will abide by our responsibility to ensure that those we deal with exercise prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for Kepler or on our behalf in any capacity, including employees at all levels, directors, contractors, suppliers, external consultants, third-party representatives and business partners. Every individual employee has completed a training module regarding modern slavery.

Our Business, Structure and Supply Chains

- Kepler Search Ltd, is an expert supplier of contractor recruitment and staffing solutions to the world's leading clients. We assist contractors in sourcing contract and permanent roles whilst operating in compliance with all local tax and employment laws. We do this by utilising a network of professional partner companies (primarily Compliance partners, lawyers and tax advisers).
- We employ 5 people in the UK.
- As we operate predominantly with white-collar, highly skilled and relatively highly paid contractors we consider the risk level to be low.
- Kepler Search Ltd offer services across Europe.
- We ensure that all our professional partner companies are audited and that they are complying with all relevant legislation including data protection, anti-bribery and modern slavery. We also issue them with our policy statement.



Responsibility for the Policy

- The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the MD, contact@kepler-search.com.

Compliance with the Policy

You must ensure that you read, understand, have been trained in and comply with this policy.

- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify your line manager or the Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or the MD or report it in accordance with our Whistleblowing Policy, summarised below, as soon as possible.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the MD.
- If you believe that you have suffered any such treatment, you should inform your line manager immediately.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and partner organisations working on our behalf if they breach this policy.

The Directors approved the above statement on 30th October 2019.