

KIN+CARTA

Modern Slavery Statement

Kin and Carta UK Limited



Building a world that
works better for everyone

January 2024

Contents

[1. Introduction](#)

[2. Our business and structure](#)

[3. Our supply chains](#)

[4. Risk assessment, risk management and due diligence](#)

[5. Our policies](#)

[6. Awareness and training outcomes](#)

[7. Progress over time in addressing Modern Slavery risks: Goals and KPIs](#)

Modern Slavery Statement

For the year ended 31 July 2023

1. Introduction

Kin and Carta UK Limited (hereinafter referred to as “Kin + Carta”) is committed to acting responsibly and ethically when conducting business and upholding its responsibility to respect human rights, a foundational principle of the United Nations (UN) ‘Guiding Principles on Business and Human Rights’ framework that applies to companies and Modern Slavery and Child Labour Laws (including the Modern Slavery Act 2015).

The term “Modern Slavery” which includes slavery, forced labour and human trafficking is a violation of fundamental human rights. Modern Slavery is a global issue and one of the most widespread crimes in the world. Child labour is another worldwide issue, where children are being deprived of their childhood, education and dignity. Children are engaged in work that may be dangerous or may cause them harm mentally, physically, socially or morally. We at Kin + Carta believe that every child deserves the rights set out in The United Nations Convention on the Rights of the Child “UNCRC”. Therefore, we have a zero tolerance policy toward any form of Modern Slavery or child labour.

2. Our business and structure

Kin and Carta plc is a digital transformation consultancy working responsibly with enterprise clients to build a world that works better for everyone.

Our revenue is generated from providing digital transformation services to clients operating in a range of sectors, including: financial services, retail and distribution, industrials and agriculture, transportation, healthcare, technology and digital media, and public sector. Our clients are primarily located in the United Kingdom and European Union.

Kin + Carta's consultants, engineers, and data scientists bring the connective power of technology, data, and experience to the world's most influential companies – helping them to accelerate their digital roadmap, rapidly innovate, modernise their systems, enable their teams, and optimise for continued growth. The borderless model of service allows for the best minds to be connected to collaborate on client challenges.

With purpose at its core, Kin + Carta has received B Corp certification. It meets high standards of verified social and environmental performance, public transparency, and accountability to balance the triple bottom line of people, planet, and profit.

3. Our supply chains

Due to the nature of our business, our company has relatively straightforward direct supply chains. Our supplier base is predominantly providers of software as a service solutions. However, some of our suppliers may have extensive supply chains, connecting us with many businesses worldwide.

We are committed to doing business responsibly and acting ethically so it is a necessity to us that our suppliers share our commitment to human rights and the prevention of Modern Slavery and child labour within their enterprise and wider supply chains.

4. Risk assessment, risk management and due diligence

In assessing Kin + Carta's risk of exposure to Modern Slavery or child labour in its supply chains, we have considered our lower risk supplier base and external data and have compared this against high risk industries. While every industry is susceptible to Modern Slavery, it is noted that the majority of forced labour victims work in domestic work, construction and agriculture¹. We have a limited number of suppliers in these industries, primarily associated with office services (e.g. cleaning contracts, maintenance).

¹ Stop the Traffik (2024): <https://www.stophetraffik.org/what-is-human-trafficking/definition-and-scale/>

We have systems and procedures in place to identify, monitor and mitigate the risk of Modern Slavery and child labour occurring in our supply chains.

These systems are:

- Our supplier selection and retention processes, which are supported by our Supplier Code of Conduct. Our Supplier Code of Conduct is intended to ensure that our suppliers confirm compliance with our mandatory requirements related to their treatment of people, health, safety and environmental responsibility and sustainable procurement, conduct of business and ethical standards of behaviour. It requires compliance with all applicable local and international laws and regulations, including all applicable human rights and equity laws, and laws prohibiting slavery, human trafficking, and any form of child labour; and adherence to our Modern Slavery Policy which sets out our zero tolerance policy towards any form of Modern Slavery and/or child labour.
- We have local Human Resource and Employee Experience functions across Kin + Carta to address employee matters and provide formal recruitment processes, which include pre-employment checks. For our UK based businesses, this includes processes to ensure that employees have the right to work in the United Kingdom and compliance with the National Living Wage.

Kin + Carta will not knowingly do business with any organisation (including acquisition targets) or body involved in Modern Slavery or child labour. We will terminate any third party relationship including but not limited to clients, suppliers and other business partners (including acquisition targets) when their business conduct is deemed to be a violation of the Modern Slavery Act or child labour laws, including but not limited to the Conventions re Minimum Age Convention, 1973 (No. 138) and Worst Forms of Child Labour Convention, 1999 (No. 182) as set out in International Labour Organization (“ILO”) Fundamental Conventions. We are also committed to protecting any whistleblowers who bring victims of Modern Slavery or child labour to light and/or call out the actions of people that facilitates or conceals these activities.

5. Our policies

Our commitment to mitigating the risk of Modern Slavery and child labour within Kin + Carta's supply chains is reinforced by the following policies of Kin + Carta:

- **Code of Ethics:** this reiterates our commitment to preventing Modern Slavery and our employees, directors, officers, executives, agency workers, contractors and interns' (our 'Kin') duty to operate in line with our policies and procedures and to adhere to applicable laws and regulations, including the Modern Slavery Act 2015. It also reiterates our values, which are: "to be deeply connected, instinctively compassionate and always courageous". These values provide a supportive organisational culture to ensure we can conduct our business practices responsibly so that our Kin and third parties can confidently raise any concerns to help prevent Modern Slavery or child labour.
- **Modern Slavery Policy:** this policy applies to our Kin, clients, business partners and suppliers. It explicitly states Kin + Carta's zero tolerance approach to Modern Slavery and child labour and provides a reference point when assessing and managing relationships with those key stakeholders.
- **Supplier Code of Conduct:** this fiscal year Kin + Carta implemented a new Supplier Code of Conduct that consolidated our previously established Supplier Code of Conduct and our supplier assessment form. It sets mandatory requirements required from our suppliers related to their treatment of people, health, safety and environmental responsibility and sustainable procurement, conduct of business and ethical standards of behaviour. It also includes desirable behaviours to encourage our suppliers to adopt best practice (e.g. commitment to paying the living wage to employees). It is a mandatory requirement of the Code that suppliers comply with all applicable human rights and equality laws and laws prohibiting slavery, human trafficking and any form of child labour, and that they adhere to our Modern Slavery Policy.
- **Whistleblowing Policy ("Speak Up"):** this is available to our Kin and third parties. The Speak Up policy outlines the procedures and channels for people to confidentially raise any concerns about suspected misconduct without fear of retaliation, and we updated it in 2023 to expressly reference concerns around violation of human rights, modern

slavery and child labour. Any matters raised through the channels outlined in the Speak Up policy are reported to the appropriate body, which may include:

- ❖ the Kin and Carta plc Board of Directors and/or Kin and Carta UK Limited’s Board of Directors with a view to an internal investigation;
- ❖ an appropriate external regulatory body for investigation; or
- ❖ the police.

These policies are available [here](#).

6. Awareness and training outcomes

Kin + Carta has developed training and guidance regarding Modern Slavery which has been disseminated globally to all staff including to key our procuring teams (Human Resources (“Employee Experience”), Office Experience and Procurement) globally. The training includes the International Labour Organisation (“ILO”) indicators of forced labour such as abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions or excessive overtime in order to educate its workforce on key indicators that would warrant urgent investigation. The training is designed to help our Kin understand, detect and know how to report Modern Slavery, Kin + Carta’s has a zero-tolerance policy toward any form of these acts. It also provides information on the systems Kin + Carta has embedded to manage risk and ensure appropriate investigation and reporting of any concerns related to a violation of a policy.

There have been no reports of finding any ILO indicators during the year.

7. Progress over time in addressing Modern Slavery risks: Goals and KPIs

During the period of the statement Kin + Carta focused on the following priority risks and goals:

- Risk that our Kin do not understand key indicators of Modern Slavery or how to report concerns, this risk has been further mitigated by the incorporation of training to our Kin, which included a monitor of completion metrics so that a KPI can be established.
- Risk involving due diligence in the operations and supply chains, progress has been made to mitigate this risk by creating a single Supplier Code of Conduct that applies to all locations and enhancing visibility on its completion metrics so that a KPI can be established.
- Risk of people not knowing how to report misconducts regarding violation of human rights, modern slavery and child labour, the risk has been further mitigated by updating our Speak Up policy in order to expressly reference these concerns and show it clearer for the reader (see “Our policies” above for more information).

Future focus areas:

- Develop mandatory training further for our Kin with organisation wide on-boarding, which includes a monitor of completion metrics so that a KPI can be established as well as end of training testing.
- Categorisation of suppliers by areas of greatest risk and/or positive impact, and developing a roadmap for greater direct collaboration on these teams.
- Continue updating Kin + Carta global policies to ensure there are references to Modern Slavery when appropriate.
- Disseminate communications targeted to relevant areas of the organisation in order to reinforce and highlight the importance of preventing Modern Slavery and child labour within our enterprise and supply chains.

KPIs

The future focus areas referenced above will allow us to improve our assessment of key performance indicators (KPIs) going forward related to training and supplier questionnaires. These KPIs will help to inform us of the effectiveness of the steps we are taking to ensure that there is no known Modern Slavery in our operations, supply chains or customer and client relationships.

This policy statement concerning Modern Slavery is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Kin and Carta UK Limited.

David Tuck

Director, Kin and Carta UK Limited

January 25, 2024