

MODERN SLAVERY STATEMENT

For the year ended 31 March 2022

KINTO UK Limited (“KINTO UK”) continue to implement procedures to effectively monitor and identify modern slavery and human trafficking within our business practices. It is our aim to ensure compliance with all applicable law and regulation, and to maintain the integrity of the KINTO brand and those of our parent and sister companies.

Modern slavery refers to the deprivation of fundamental human rights, including freedom from forced labour and the right to liberty, for the purpose of personal or commercial gain. This covers a wide range of exploitative practices such as slavery, servitude and human trafficking.

KINTO UK continue to be fully committed to acting responsibly and ethically within our commercial dealings and are always actively seeking to improve and implement preventative mechanisms to minimise the risk of modern slavery within our businesses and supply chains.

This sets out the actions we have taken to prevent modern slavery and human trafficking within our business and supply chain since our last statement was published, in June 2020.

Our policies on slavery and human trafficking

In 2020 we updated our Code of Conduct, including our modern slavery policy, to ensure that this reflects changes within our organisation following acquisition, changes to legislation and provides a more effective and robust framework. This goes hand in hand with our updated whistleblowing policy, which facilitates clear communication of misconduct and promotes an open and ethical culture within our organisation.

Due diligence processes

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

We recognise that ethical and productive partnerships with our suppliers strengthen our business, our reputation and that of our OEM partners, suppliers and customers. We treat all suppliers fairly

and with respect and we expect them to know and agree to uphold our high standards of compliance and ethics set out in our Supplier Code of Conduct.

More than 90% of our direct supply comes from organisations that are, themselves, required to publish statements setting out the steps that they have taken in this regard. We have reviewed those statements, where available, and will continue to do so periodically.

Commercial Agreements

KINTO UK has in place commercial agreements with its customers and suppliers which contain robust provisions in relation to modern slavery, requiring compliance with the legislation, enforcement of appropriate anti-slavery policies and an obligation to ensure that our partners hold their sub-contractors to the same standards. These agreements are being updated and re-launched in 2020 to coincide with the launch of our new brand “KINTO UK”.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide mandatory e-training to our staff on an annual basis.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and our contractors comply with our values we have a dedicated compliance team, which consists of involvement from the following departments:

- Legal and Compliance;
- Human resources;
- Operations;
- Procurement; and
- Sales.

On-going commitment for Financial Year 2021/22

We have a responsibility to continue taking initiatives to combat acts of modern slavery and uphold the integrity of our brands. We are committed to the continuous development of our business procedures in order to provide clarity as to our expectations within our commercial dealings and supply chain. This is essential for the efficiency of our businesses and the maintenance of high health, safety and environmental standards that we set ourselves. We continue to encourage our employees, representatives and suppliers to be pro-active and reactive in their compliance with legislation and to work to the highest professional standards in order to help eradicate acts of modern slavery within our businesses and supply chain.

Further Supplier Audits

Over the next fiscal year, we shall be increasing the surveillance of our supply chain by conducting further audits on key suppliers. Our compliance and procurement teams will be introducing a new methodology matrix which will improve our ability to develop our reporting methods.

This statement is approved by Matthew Rumble, CEO of KINTO UK Limited.

Date of Signature: 10th June 2021