



Kiwa UK Modern Slavery Policy

Purpose: This Policy aims to prevent slavery, forced labour, and human trafficking within our business and supply chains, in compliance with the UK Modern Slavery Act 2015.

Scope: Please define the scope of the policy, recommended definitions:

- **Kiwa Corporate:** Corporate entities and Corporate functions
- **Kiwa Group:** all entities directly or indirectly owned by Kiwa (Acta* Holding B.V.) for fifty percent (50%) or more, or the ability of Kiwa to affect (in)direct control of the management decisions of such entity
- **Kiwa UK:** Kiwa Holdings (UK) Limited and its direct or indirect subsidiaries, including but are not limited to Kiwa Limited, IFC Group Limited, International Fire Consultants Limited, IFC Certification Limited, Product Compliance Specialists Limited, BASEC Group Limited, BASEC Private Limited, BASEC Conformity Limited, NQA Certification Limited and National Quality Assurance Limited

Version	5.3 (KUK P 104)
Policy implementation date	01 st October 2026

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1 General

1.1 Introduction

Kiwa UK is committed to preventing modern slavery and human trafficking occurring within our organisation and to tackling the risk of occurrence in our supply chain. This policy sets out measures we will take towards this and our expectations of our staff and third parties with whom we work.

1.2 Purpose

This Policy aims to prevent slavery, forced labour, and human trafficking within our business and supply chains, in compliance with the UK Modern Slavery Act (MSA) 2015.

1.3 Applicability

Modern slavery is a complex and sophisticated crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

The Kiwa Group Code of Business Conduct reflects our commitment to acting ethically and with integrity in all our business relationships. All Kiwa UK employees complete Kiwa Code of Conduct training in line with the TIC Council Compliance Code.

(MSA) 2015 legislation coupled with Kiwa UK Group's ethical standards prevent Child Labour and Forced and Compulsory Labour in the direct workforce. Kiwa has a robust approach to risk assessment and has applied double materiality analysis to identify specific ESG-related risks including labour conditions and rights.

2 Slavery

The MSA 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. The following key signs could indicate that someone may be a slavery or trafficking victim:

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- the person is not in possession of their own passport, identification or travel documents;
- the person is acting as though they are being instructed or coached by someone else;
- they allow others to speak for them when spoken to directly;
- they are dropped off at and collected from work;
- the person is withdrawn or they appear frightened;
- the person does not seem to be able to contact friends or family freely; and/or
- the person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it.

3 Responsibilities

Kiwa UK, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

The Kiwa UK ESG Lead and Legal Counsel are responsible for our modern slavery risk management strategy and compliance with our legal and ethical obligations.

The Kiwa UK Senior Leadership Team have overall accountability for our organisation's modern slavery risk management strategy.

Everyone working for us including contractors and consultants must observe this policy and be aware that turning a blind eye is unacceptable, and simply not an option. Through our strategy, vision and values we communicate our principles, which reflect our approach to modern slavery in our organisation, and in our supply chain.

Kiwa UK will:

- regularly assess the risk of modern slavery and human trafficking occurring within our organisation and supply chain, and commit to taking steps to reduce those risks;
- ensure we meet applicable legal obligations;
- ensure those leading and implementing our modern slavery strategy and compliance have appropriate knowledge and expertise, adequate resources and training;
- develop and communicate internally and to our suppliers, clear policies and procedures setting out our expectations, aimed at preventing slavery and human trafficking and protecting our workforce and reputation;

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- implement systems and processes to manage occupational health and safety risks within our organisation and promote the wellbeing of our staff;
- be clear about our recruitment policy and lead by example by making appropriate checks on all employees, recruitment agencies, consultants and other relevant contractors to ensure we know who is working for us and by ensuring all those working for us are aware of this policy as part of our onboarding;
- check our supply chains;
- ensure we have open and transparent reporting and grievance processes for all staff, and that there are no barriers to reporting modern slavery concerns or breaches of our policies;
- raise awareness so that our colleagues know what we are doing to promote their welfare;
- make a clear statements setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our organisation or in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously;
- evaluate our strategy, and measure its effectiveness including the development of our organisational values and ethical behaviours; and
- ensure any incident of modern slavery is dealt with appropriately and relevant remedies are made available to victims.

Managers will:

- listen and be approachable to colleagues;
- respond appropriately if they are told something that might indicate a colleague or any other person is being exploited;
- remain alert to indicators of slavery;
- raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do; and
- use their experience and professional judgement to gauge situations.

Colleagues will:

- keep eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure;
- follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated;
- tell us if you think there is more we can do to prevent people from being exploited; and
- familiarise yourself with the Kiwa Group and Kiwa UK policies and procedures.

Kiwa UK will check and monitor its supply chains to identify, assess and manage modern slavery risks.

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Kiwa UK will tell the organisations we do business with that we are not prepared to accept any form of exploitation. We actively encourage responsible employment practices in our supply chain to ensure workers are provided with a safe and healthy environment, are aware of their rights, and are able to raise concerns without fear, mirroring our own culture and values.

Kiwa UK will seek, where possible, to incorporate anti-slavery obligations in our supplier contracts.

Kiwa UK will seek to account for each step of our supply processes—so we know who is providing goods and services to us and we have mechanisms and processes in place to check.

4 Anti-slavery statement

We make a clear statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our organisation or our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our customers seriously.

This statement will be approved by the Kiwa UK senior leadership team.

We make this statement as part of our company reporting and through this policy.

5 Reporting slavery

We encourage anyone affected by modern slavery or human trafficking, or anyone with concerns that someone within our organisation, supply chain or business associates is affected by modern slavery and human trafficking to speak up. If you raise a concern under this policy in good faith, we will support you, even if you turn out to be mistaken.

Talking to someone about your concerns may stop someone from being exploited or abused. You should discuss your concerns through the SHV Speak Up Policy.

We have procedures in place to investigate any concerns raised and to ensure where appropriate remedial action is taken. Our procedures put victims and workers first. Where an issue concerns part of our supply chain we are committed to working with those supply chain members to facilitate improvement and education to reduce the risk of future slavery occurrences. Whilst we may consider terminating our relationship, this will not be our starting point.

6 Monitoring and review

The Kiwa UK ESG Lead and the Legal Counsel will review and report to the Kiwa UK senior leadership team regularly, at least annually, and at additional intervals as may be required regarding:

- our existing and emerging legal obligations;
- emerging modern slavery trends, risks and developments relevant to our organisation including the impact of any changes on our organisation or our approach;
- feedback from stakeholder engagement, our audit process and our colleagues;
- the effectiveness of our processes and procedures;

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- any recommended changes in our approach;
- any suspected or identified cases of modern slavery; and
- who it is appropriate to consult internally and externally regarding modern slavery risk.

The Kiwa UK senior leadership team will approve any changes to our strategy, policy and procedures, and we will provide information and/or training on any changes we make both internally and through our supply chain, using appropriate methods and channels of communication.

We are committed to continual development and improvement of our approach. If you have any feedback regarding this policy or our approach, please provide this to uk.legal@kiwa.com.

Signed:

Signed by:

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Sarah Grant, Kiwa UK Group CEO