Modern Slavery and Human Trafficking Statement for Financial Year Ended 31<sup>st</sup> March 2018 issued pursuant to section 54 of the Modern Slavery Act 2015.

## Our Business, Structure and Supply Chains

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Employees are expected to report concerns and management are expected to act upon them.

The Kindertons Group provides accident management and legal services. We currently employ 1000+ staff across 6 businesses and 19 locations across the UK. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains, business partners or any part of our business. Our Anti-Slavery policy reflects this.

The company acknowledges responsibility to the Modern Slavery Action 2015 and will ensure transparency within the organisation and the suppliers of goods and services to the organisation.

As part of the company's due diligence processes, the Supplier Approval Process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources outside of the UK and EU are potentially more at risk for the slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

## **Our Policies**

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

## Whistleblowing policy.

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers others who have concerns can use our confidential helpline: 0800 056 2539 or confidentially report it to: report@seehearspeakup.co.uk. **Employee Code of Conduct:** The organisation's code makes clear to employees that actions and behaviours expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

## Our Effectiveness in Eliminating Modern Slavery

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure slavery and human trafficking is not taking place within the organisation and within our supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request. This policy statement will be reviewed annually and published.

Signed on behalf of the company

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**Neil Cunningham** 

**Group CEO** 

Next Review: July 2019