



## Modern Slavery Act

### Introduction

This Modern Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the Act) relating to transparency in supply chains. We recognise our responsibility to take a proactive and robust approach in addressing modern slavery and human trafficking within our business and supply chains.

We are committed to ensuring that everyone who works for us benefits from a working environment where their fundamental human rights are respected. We expect all business partners and suppliers to uphold these principles. Our controls have remained effective throughout the financial year ending 31 March 2025, and we continuously develop our approach to identify and mitigate risks.

This is our fifth statement, published in compliance with the Act, setting out the steps taken during the financial year ending 31 March 2025 to identify and prevent modern slavery within our operations. We will continue to review and update this statement annually in accordance with the Act.

### Organisational Structure

Through our subsidiaries, we are a leading UK provider of specialist property services, delivering compliance and sustainability solutions to local authorities and housing associations.

We are the parent company of the Kinovo Group, which has over 255 employees and operates exclusively in the UK, with its head office in Chingford.

### Our Business

Established in 2015, we have grown through strategic acquisitions in the mechanical, electrical, and general building services sectors. Today, we are a leading provider of safety and regulatory compliance, home and community regeneration, and sustainable energy solutions.

Our commitment to operational excellence and customer service underpins our work in London and South-East England.

### Our Policy on Modern Slavery and Human Trafficking

We believe that culture and controls are interdependent. We can achieve more when our people, business partners, and suppliers understand the importance of their roles and take collective responsibility to eliminate modern slavery.

We have a zero-tolerance approach to modern slavery, human trafficking, and labour exploitation within our business and supply chains. Employees who fail to comply with this policy may face disciplinary action, up to and including dismissal. Contractors and third parties found to be non-compliant risk termination of their contracts.

Our internal and external policies set out expectations and ethical standards, including:

- Employee handbook (covering ethical and conduct-related policies)
- Equality and diversity policy
- Health and safety policy
- Corporate social responsibility policy
- Environmental policy
- Residents and customers with special needs code of conduct
- Equal opportunities policy
- Anti-bribery and corruption policy

These policies are reviewed annually to ensure they remain fit for purpose.

We also maintain a whistleblowing policy to manage concerns related to modern slavery. All employees have access to the latest version of this policy.

## Governance

Our Board of Directors holds overall responsibility for modern slavery reviews. The Modern Slavery Statement is reviewed and approved by Board resolution annually.

## Our Supply Chains

Our supply chain is critical to our success. We strive to build long-term relationships based on fairness and shared values. We work with suppliers who align with our ethical principles to deliver social, economic, and environmental benefits.

We undertake due diligence to assess the suitability of our suppliers, ensuring they meet high standards of business conduct. Suppliers are assessed for compliance with the following criteria:

- No forced labour or human trafficking, and employment is freely chosen
- Safe and hygienic working conditions
- Reasonable working hours
- Fair wages
- No harsh, cruel, or degrading treatment
- No discrimination

Failure to meet these criteria results in exclusion from our supplier network.

## Supplier Due Diligence Process

The greatest risk of modern slavery lies within our supply chain, and we take rigorous steps to mitigate these risks.

Our due diligence process includes:

- Risk assessments for direct and indirect suppliers
- Ongoing monitoring, including a risk rating system based on sector and country risk
- Third-party assessments for on-site inspections when necessary

## Training, Recruitment and Communication

We ensure all employees understand the Modern Slavery Act, its implications, and their role in preventing modern slavery. This statement is shared via our internal communication channels and published on our website.

Our Group-wide intranet provides training on modern slavery and human trafficking, reinforcing our expectations and commitments.

Our recruitment process is transparent and regularly reviewed. We conduct pre-employment checks, including:

- Identity verification
- Right-to-work checks
- Screening for compliance with our employment standards

All new employees receive an overview of our policies, including whistleblowing.

## Key Performance Indicators (KPIs)

We are developing KPIs to track progress in reducing modern slavery risks. These will focus on raising awareness, particularly within our supply chain and site-based teams.

Our KPIs will likely include:

- Number of modern slavery and human trafficking incidents
- Training completion rates across the business and supply chain

## Approval

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and applies to Kinovo Limited and all its subsidiaries. It was approved by the Boards of the following Kinovo Group companies on 7 November 2024:

- Kinovo Limited
- Bilby Limited (Dormant)
- P&R Installation Company Limited
- Purdy Contracts Limited
- Spokemead Maintenance Limited
- Dunham (UK) Limited

**Lee Venables**

COO

Kinovo Limited