

Modern Slavery Statement

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes Kiplun Limited (**Kiplun**)'s slavery and human trafficking statement for the financial year ending March 2019 and sets out Kiplun's commitment to preventing slavery and human trafficking in all its business activities and within its supply chains.

Of Kiplun's wholly-owned subsidiaries, this statement covers the activities of Pickerings Europe Limited.

Our business

Kiplun is a holding company for a corporate group structure (**Group**). The principal activities of the Group are the installation, service, repairs and modernisation of lifts, loadings systems and escalators and supply of associated products. In addition, the Group has a majority shareholding in a cyber security company and operates high specification country houses. We have over 400 employees and operate in the UK. Our staff are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in this country. Our focus is therefore to ensure there are policies and procedures in place for our contractors and suppliers.

We have an annual turnover of £50 million.

Our policies

We have a number of policies to ensure we are conducting business in an ethical and transparent manner including: These include:

- Code of Conduct -
- Safeguarding policy -
- Whistleblowing policy -
- Pre-employment checks -

Our Company core values can be found on the Company corporate website www.pickeringslifts.co.uk

Our supply chains

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains and to act ethically and with integrity in all our business relationships.

Our supply chains are predominantly UK based although we do also import from Europe, and to a lesser level the US/Canada. Supplier due diligence is undertaken as part of our new supplier process, which includes checking against corporate databases and consideration of the geographical risks of modern slavery.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we insist on proof of identity and eligibility to live and work in the UK prior to any offer of employment being made. This can be in the form of a Passport or Birth Certificate and a P45.

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.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a supply chain compliance programme. This consists of due diligence as part of our new supplier process as set out above.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Audit and compliance.
- Human resources.
- Procurement.
- Sales.

Our effectiveness in combating slavery and human trafficking

We continually measure the success and performance of our organisation by tracking key performance indicators such as employee engagement, health, safety and environment practices. A similar set of key performance indicators continues to be developed and applied in order to measure the effectiveness of our compliance with the Modern Slavery Act.

Future steps

Over the course of the next financial year we intend to take the following further steps to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers:

- Roll out supply chain risk and modern slavery online training across the business in 2019.
- Carry out supplier desktop reviews.

This statement has been formally approved by the Directors of Kiplun Limited and signed on their behalf.



Kiplun Limited JDR FOTHERGILL

Date: 29 March 2019