

Modern Slavery, Forced Labour and Human Trafficking Policy and Guidelines

Effective Date: 24/3/25

Review Date:

Policy Owner: Managing Director, Key Precision Ltd

1. Introduction

Key Precision Ltd is committed to ensuring that modern slavery, forced labour, and human trafficking have no place in our business or supply chains. We uphold the principles of ethical business practices, fair treatment, and human rights as enshrined in the **Modern Slavery Act 2015**.

This policy outlines our approach to identifying, preventing, and addressing modern slavery risks in our operations and those of our partners and suppliers.

2. Scope

This policy applies to:

- All employees, contractors, and temporary workers of Key Precision Ltd
 - Our supply chain partners, including subcontractors and service providers
 - Any other third parties working on behalf of the company
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3. Our Commitment

Key Precision Ltd will:

- Operate zero tolerance for modern slavery, forced labour or human trafficking
 - Act transparently and with integrity in all our business relationships
 - Implement and maintain due diligence procedures to assess and mitigate slavery risks
 - Encourage openness and protect whistleblowers who raise concerns in good faith
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4. Definitions

- **Modern Slavery:** Encompasses slavery, servitude, forced and compulsory labour, and human trafficking.

- **Forced Labour:** Work performed involuntarily and under coercion, threat, or deception.
 - **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by improper means (e.g., force, fraud, or coercion) for exploitative purposes.
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5. Roles and Responsibilities

- **Directors and Managers:** Responsible for ensuring policy implementation and promoting ethical practices.
 - **HR Department:** Ensures recruitment and employment practices are fair, legal, and transparent.
 - **Employees:** Must report any concerns or suspicions related to modern slavery or unethical conduct.
 - **Suppliers:** Must comply with our ethical standards and agree to contractual clauses prohibiting modern slavery.
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6. Due Diligence and Risk Assessment

Key Precision Ltd will:

- Conduct supplier risk assessments based on geography, sector, and known vulnerabilities
- Vet suppliers through questionnaires, audits or declarations of compliance
- Review labour practices, especially where recruitment agencies are used

We prioritise reviewing suppliers in sectors or regions where there is a higher risk of modern slavery.

7. Recruitment and Employment Practices

- We only work with reputable employment agencies and verify the legitimacy of all workers
- Workers are employed voluntarily and are free to leave in accordance with their contracts
- No recruitment fees are charged to workers

- Employees are provided with written terms of employment and paid at least the National Minimum Wage
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8. Supplier Code of Conduct

We expect our suppliers to:

- Prohibit forced or involuntary labour
- Provide safe and hygienic working conditions
- Not withhold identity documents or restrict movement
- Respect workers' rights to freedom of association and collective bargaining
- Comply with all applicable labour laws

Failure to meet these standards may result in termination of the business relationship.

9. Training and Awareness

Key Precision Ltd will provide training to:

- Ensure staff understand the risks and signs of modern slavery
 - Equip employees, especially those in procurement and HR, to manage risks effectively
 - Promote awareness through onboarding and refresher training
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10. Reporting and Whistleblowing

Concerns about modern slavery can be reported in confidence via:

- Line managers
- HR department
- Anonymously via [Insert Whistleblowing Hotline or Email, if applicable]

We will investigate all concerns promptly and take appropriate action.

11. Monitoring and Review

- This policy will be reviewed annually or as required by law or business changes

- We will report annually (where applicable) in line with Section 54 of the Modern Slavery Act
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12. Approval

This policy has been approved by the Board of Directors and is endorsed by senior management.

Signed: 

Greg Jackson.

Managing Director, Key Precision Ltd

24/3/25
