# **Kogo** Modern Slavery and Human Trafficking Statement

Author: Martin Bannister Tel: 01342 333000 Email: info@kogo.co.uk Date Created: 12/03/2022 Revision: 1.0



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# 1. Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31<sup>st</sup> March 2021.

Kogo Limited ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in our own operations, its supply chain, and its products. We have zero-intolerance towards slavery and require our supply chain to comply with our values.

# 2. Organisational Structure

Kogo Limited has business operations in the United Kingdom.

We operate in the Information Technology sector. The nature of our supply chains is as follows: -

We work with specially selected suppliers that provide us with various items including IT equipment, Cloud Services, IT Software and network connectivity.

For more information about our company please visit our website: www.kogo.co.uk

# 3. Policies

We operate a number of internal policies to ensure we are conducting business in an ethical and transparent manner.

These include the following: -

#### 3.1. Recruitment and selection policy

We perform background checks and obtain references for all our employees. We check their eligibility to work in the UK. We obtain copies of their driving licenses and/or passports.

#### 3.2. Supplier code of conduct

We ensure all suppliers fill in a supplier account application form and if relevant perform checks on their own Modern Slavery status.

### 3.3. Whistleblowing Policy

If we suspect Modern Slavery or Trafficking exists within our supply chain or within our own organisation it is reported to our First Responder. They will in turn report it to directors and if required report it to the Modern Slavery helpline.

#### 3.4. Staff Code of Conduct

Our staff code of conduct encourages all managers and staff to understand how to identify Modern Slavery and Trafficking within our supply chain and own organisation. They are encouraged to report any suspicions to our First Responder so it can be assessed and dealt with.

#### 3.5. Procurement Policy

We only purchase from suppliers that not only adhere and have a modern slavery statement or ones that complete our supplier verification process.

We ensure our suppliers are aware of our policies and adhere to the same standards.

### 4. Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chain we have adopted the following due diligence procedures:

• Internal Supplier Audits

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers

# 5. Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through: -

- Evaluating the slavery and human trafficking risks if each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider we operate in a high-risk environment because all of our supply chain is based in the UK or Ireland and are in low-risk industries. We do not procure products or services from overseas.

# 6. Effectiveness

The Company used Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. The KPIs are as follows: -

- We will contact suppliers to enquire about their modern slavery practices every 12 months.
- We will train our staff about modern slavery issues and increase awareness within the Company
- We will carry out a regular audit of suppliers each year.

# 7. Training our staff

The company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking.

The Company's training covers:

- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company

### 8. Declaration

The statement was approved by the board of directors.

Martin Bannister Managing Director Kogo Limited