

1. Introduction

At Kinetic-ID, we are committed to operating with integrity, transparency, and a respect for human rights. We recognise that modern slavery, human trafficking, and forced labour are grave violations of fundamental human rights, and we have a zero-tolerance approach to any form of modern slavery within our organisation or supply chains. Although we are an SME, we are committed to upholding high ethical standards in all areas of our business, taking steps that reflect our size and resources.

2. Our Organisation, Business & Supply Chains

Kinetic ID is a biotechnology SME, committed to innovation across the life-science healthcare, pharmaceuticals, and scientific research. Operating from our headquarters in Bognor Regis, UK, and with offices in Droitwich, UK, and Clonmel, Ireland, we have a workforce of approximately 25 employees. Despite our size, we recognise the significant responsibility we have in ensuring that ethical practices are upheld throughout our operations and supply chain.

Kinetic ID has built a specialised supplier base that supports our manufacturing and service delivery:

- 30% of our suppliers are located within a 30-mile radius of our manufacturing sites, which enables us to reduce transportation emissions and maintain close oversight of production processes.
- 30% of our suppliers are based across the UK, offering us flexibility and access to high-quality materials and services within a broader geographical reach.
- 30% of our suppliers are located within mainland Europe, where we maintain strong relationships to source specialised components and materials for our biotech products.
- The remaining 10% of our suppliers are based across Asia, primarily providing advanced technology components and raw materials critical to our innovation-driven projects.

While we recognise that, as a smaller organisation, we may have fewer resources compared to larger companies, we are committed to ensuring that our business and its supply chains are free from modern slavery and human trafficking. We maintain strong relationships with our suppliers and ensure they are aware of our expectations regarding ethical practices.

3. Policies Related to Slavery & Human Trafficking

We have implemented robust policies and procedures to combat modern slavery and human trafficking, including:

- **Code of Conduct:** Our Code of Conduct, set out in the HR Handbook, outlines our commitment to human rights and ethical business practices, including zero tolerance for modern slavery.
- **Whistleblowing Policy:** We encourage employees (as set out in the HR Handbook) and third parties to report any concerns related to modern slavery or unethical practices through our confidential whistleblowing channels.

4. Due Diligence Processes

Our due diligence processes are designed to ensure that modern slavery and human trafficking do not take place in our business or supply chains. These processes include:

- **Supplier Audits:** We regularly audit suppliers to ensure compliance with our ethical standards, focusing on identifying and addressing any risks related to modern slavery.
- **Contractual Obligations:** We incorporate clauses in our contracts with suppliers and partners, requiring them to adhere to anti-slavery laws and our ethical standards.
- **Ongoing Risk Assessments:** We continually assess the risk of modern slavery in our supply chain, focusing on high-risk areas.

5. Risk Assessment & Management in Business & Supply Chains

We recognise that certain areas of our business and supply chain may present a higher risk of modern slavery, particularly when dealing with suppliers in regions or industries where labour practices are less regulated. As an SME, we take a targeted approach to identifying and managing these risks:

- **Risk Assessments:** We periodically conduct risk assessments of our business and supply chains to identify any areas of increased vulnerability to modern slavery. This includes looking at factors such as geographical location, sectorspecific risks (such as those involve in manufacturing in low-cost regions), and supplier practices.
- **Risk Management Steps:** Where we identify potential risks, we work with our suppliers to implement corrective measures. This may involve working with them to improve their labour conditions or choosing to cease working with suppliers that fail to meet our standards.

6. Effectiveness in Combating Modern Slavery

We measure our effectiveness in ensuring that slavery and human trafficking are not taking place in our business or supply chains using performance indicators such as:

- The number and frequency of supplier audits conducted.
- The number of whistleblowing reports and investigations related to modern slavery.
- Compliance rates with our contractual obligations and ethical standards.

7. Use of the Modern Slavery Assessment Tool (MSAT)

As part of our commitment to tackling modern slavery, Kinetic-ID uses the Modern Slavery Assessment Tool (MSAT) provided by the Cabinet Office. This tool helps us take reasonable and proportionate steps to ensure our supply chain operates ethically. Our key commitments include:

- **Regular Assessments:** We commit to using the MSAT to assess our antislavery practices on an annual basis, ensuring that we stay aligned with legal requirements and identify areas for improvement.
- **Supplier Collaboration:** We use the tool to engage with our key suppliers, particularly those in higher-risk sectors or regions, to ensure they meet our ethical standards. This includes discussions about compliance and improving transparency where necessary.

- > **Focused Action:** Given our size, we focus our resources on the areas of our supply chain that present the highest risk of modern slavery. We commit to monitoring these areas closely and taking appropriate actions if risks are identified.
- > **Continuous Improvement:** We will review the findings from the MSAT and take practical steps to improve our policies and practices, ensuring our approach evolves as our business grows.

This tool provides us with a structured yet manageable way to ensure that our efforts to combat modern slavery are effective and appropriate for an SME like ours.

8. Training & Capacity Building

Raising awareness about modern slavery and human trafficking is crucial to preventing these abuses. As a small company, we focus on targeted training for key personnel, ensuring that those involved in procurement, supply chain management, and human resources are well-equipped to recognise and address potential issues:

- > **Training:** Regular training sessions for key staff to ensure they understand the risks of modern slavery, can recognise potential warning signs, and know how to take action if needed.
- > **Supplier Engagement:** We engage with our suppliers and partners to raise awareness of modern slavery and human trafficking risks and ensure they are equally committed to addressing these issues.

9. Ongoing Commitment

We are continuously reviewing and improving our policies and procedures to combat modern slavery. As part of this commitment, we will continue to monitor our supply chain and business operations, engage with stakeholders, and take appropriate action where necessary to uphold our values.

Approval & Review

This statement is made in accordance with the Modern Slavery Act 2015 and will be reviewed annually to ensure it remains relevant and effective. Kinetic-ID is dedicated to ensuring that modern slavery has no place in our business or supply chains, and we will take any necessary steps to safeguard against these abuses.



Andrew Daly

Chief Executive Office

Kinetic-ID

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