

Modern Slavery Policy



THE
KING'S
CROSS
GROUP

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1.0 - Policy Statement

Modern slavery is a criminal offence and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. The common feature of all of these is the deprivation of a person's liberty to exploit them for personal or commercial gain.

The King's Cross Group LP (acting by its general partner, The King's Cross Group GP Limited) has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking are not taking place within our own organisation or our supply chains.

We recognise and comply with our disclosure obligations under the Modern Slavery Act 2015 and are committed to ensuring transparency within our own organisation and in our approach to tackling modern slavery throughout our supply chains.

2.0 - Scope

- 2.1 This policy applies to The King's Cross Group LP (acting by its general partner, The King's Cross Group GP Limited) and all of its group companies, subsidiaries, associated companies and joint ventures (jointly referred to as "**The King's Cross Group**").
- 2.2 This policy applies to all persons working for The King's Cross Group or on its behalf in any capacity, including employees, directors, officers, agency workers, consultants, suppliers, contractors, sub-contractors, agencies and business partners.
- 2.3 If you are uncertain whether something is within the scope of this policy, you should seek advice from the Chief Operating Officer ("**COO**").
- 2.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3.0 - Our supplier expectations

- 3.1 We expect our suppliers to implement best practice to ensure they take all steps necessary to combat modern slavery in their business supply chains, including adopting the minimum labour standards set out in paragraph 4 of this policy.

- 3.2 Our approval of a supplier will be subject to the supplier having effective controls to identify and address modern slavery in its supply chains. Where exploitation and abuse of workers is identified, this must be immediately reported to us and suppliers must take steps to address it and put in place appropriate safeguards to ensure exploitative practice is not repeated. We reserve the right to terminate our relationship with any supplier who fails to achieve and maintain the minimum standards set out in this policy.
- 3.3 As part of our contracting processes, we will include specific prohibitions against the use of slave, forced, compulsory or trafficked labour, and we expect that all of our partners, suppliers, contractors, sub-contractors, consultants and agencies will hold their own suppliers to the same high standards.
- 3.4 We expect our suppliers to take all reasonable and appropriate steps to raise awareness within their supply chains to help to prevent and protect workers from exploitation or abuse.

4.0 - Our minimum labour standards

- 4.1 Both employees and workers are entitled to certain employment rights including but not limited to receiving the national minimum wage; the statutory minimum level of paid holiday; the statutory minimum length of rest breaks; to not work more than 48 hours on average per week or to opt out of this right if they choose; to not be treated less favourably if they work part-time; protection against unlawful deduction from wages; protection against unlawful discrimination; protection for 'whistleblowing'. Migrant workers are at a high risk of abusive, exploitative work conditions due to various factors including not being aware of their rights, not feeling confident making a claim in English or being concerned of losing their only source of income.
- 4.2 With reference to employees and workers in our business, all migrant workers must be treated in accordance with the requirements of all applicable laws and our HR policies and practices and will be subject to the same employment contract terms as other potential recruits. All workers, irrespective of their nationality or legal status, are required to be treated fairly and equally.
- 4.3 The King's Cross Group adopts the following practices in its own business and requires that all businesses in its supply chain (including suppliers, contractors and sub-contractors) adopt the following standards:
 - 4.3.1 workers must not be subject to any form of forced, compulsory or bonded labour. Workers must have the freedom to terminate their employment at any time without penalty, given notice of reasonable length as required by their employment contract or any other contractual arrangement in relation to the practice of labour;
 - 4.3.2 all employees must be provided with their employment contract prior to beginning work. The use of supplemental agreements and any practice which involves replacing an original contract or any of its provisions with those that are less favourable are strictly prohibited;
 - 4.3.3 all workers must be paid at least the minimum wage (as stipulated by relevant applicable laws) and must be provided with all benefits that are required by the relevant laws. If there are workers undertaking work overseas, they must be paid at

least the local minimum wage (as stipulated by the relevant local applicable laws). Clear information must be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. Wage payments must not be delayed, deferred, or withheld and only deductions, advances, and loans permitted by law;

- 4.3.4 working hours must be consistent with the requirements of law and all overtime worked must be voluntary, unless part of a legally recognised collective bargaining agreement. Workers must be paid for any overtime worked (unless a time off in lieu arrangement is in place);
- 4.3.5 workers must not be charged any fees or costs for recruitment, directly or indirectly, including costs associated with travel, processing official documents and work visas in both home and host countries;
- 4.3.6 workers should not be required to lodge deposits or security payments at any time and confiscating or withholding identity documents or other valuable items, including work permits and travel documentation (such as passports) is strictly prohibited;
- 4.3.7 the workplace must be free of any form of harsh or inhumane treatment such as harassment, mental or physical coercion. Sanctions that result in wage deductions or any practices of equivalent effect are strictly prohibited; and
- 4.3.8 if the subcontracting of recruitment and hiring is necessary, the labour agencies that are engaged must operate in accordance with all of the requirements of relevant laws and, if required, should be certified or licensed by the competent authority. The agencies/labour recruiters must not engage in any behaviour that places workers at risk of forced labour or trafficking for labour exploitation.

5.0 - Compliance with the policy

- 5.1 You must ensure that you read, understand and comply with this policy.
- 5.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy or the Modern Slavery Act 2015.

6.0 – Reporting modern slavery concerns

- 6.1 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any business partner, supplier, contractor or sub- contractor at the earliest possible stage.
- 6.2 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or the COO as soon as possible. Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our contractors and suppliers to help them

address coercive or exploitative work practices in their own business and supply chains or may refer them to the appropriate agencies for support and guidance. We will also follow all reporting requirements which are required by law, including reporting and liaison with law enforcement agencies where appropriate.

- 6.3 If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager or the COO.
- 6.4 We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

7.0 - Communication and awareness of this policy

- 7.1 Training on this policy and modern slavery is available to all employees within The King's Cross Group, and we require all our employees to complete this training. We require all business partners, suppliers, contractors and sub-contractors to have an appropriate system in place for ensuring that their employees receive training on modern slavery.
- 7.2 Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. We will require suppliers that we contract with to confirm compliance with this policy, in writing, on a regular basis.
- 7.3 This policy will be reviewed annually, and all updates published and communicated to all employees, contractors and suppliers as appropriate.
- 7.4 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.5 We may terminate our relationship with other individuals and organisations working with us if they breach this policy.

8.0 - Responsibility for the policy

- 8.1 The COO has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 8.2 The board of directors of KCGM has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

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