



## **Modern Slavery and Human Trafficking Policy.**

### **Director's Statement – Modern Slavery Act 2015 (the 'MSA Act')**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Kuiper Technology Ltd (the Company) slavery and human trafficking statement for the financial year ending December 2019.

### **Introduction**

This statement sets out the Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The senior management team at Kuiper Technology Ltd recognises that they have a responsibility to take a robust approach to slavery and human trafficking.

### **Risk Assessment Process**

Kuiper Technology will refuse to work with any suppliers that do not have a clear supply structure in place or are uncertain of the origin of their goods. Suppliers will be vetted using a questionnaire to ensure that they also have policies and statements in place to guarantee that they are implementing the same (or similar) steps as us to help with these crimes. Any suppliers that are found guilty of falsifying their answers will be reported to the relevant bodies to ensure that our legal and morale responsibilities are fulfilled.

### **Relevant Policies**

**Whistleblowing Policy** – Kuiper Technology encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Kuiper Technology Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retribution.

**Ethical Trading Policy** – The Company is commitment to ethical trading and sets expectations of its own employees and those within its supply chain within the Ethical Trading Policy. It is expected that all employees within the Company and its supply chain are treated in accordance with this policy.

**Anti-Bribery** - It is the policy of the Company to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

## **Recruitment / Agency workers'**

Kuiper Technology uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## **Due diligence**

- The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

### **This process includes;**

- Evaluating the modern slavery and human trafficking risks of each new supplier by requesting they complete a questionnaire including questions regarding Modern Slavery Act.
- Maintain ongoing communication on a regular basis with suppliers which will include discussions about any relevant changes to their practices
- Zero tolerance for modern slavery and respect for human rights will be built into new supplier discussions and also represented in dialogue with sub-contractors, customers and other business partners.

## **Monitoring**

Kuiper Technology has developed a system for supply chain verification, whereby the company evaluates potential suppliers before they enter into our supply chain in terms of the Modern Slavery Act as outlined above.

## **Training**

All employees have been made aware of the Modern Slavery Policy and are aware of the Company's commitment to it. All employees have access to the Policy and are reminded of it on an annual basis.

## **Steps Taken & Key Measures for 2020**

The company commit to ensuring that individuals employed in the Supply Chain team will undergo update training on Modern Slavery in the next 12 months.

## **Board Approval**

This statement has been approved by Kuiper Technology board of directors, who will review and update it annually.

Andrew Russe11

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*Andrew Russell*  
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