

INTERNAL

Modern Slavery Act Statement

Introduction

AVMI Kinly Ltd (known as Kinly) is a legal entity within the Kinly group of companies. This statement sets out Kinly'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 or its supply chains. This statement relates to actions and activities during the financial year ending 31st December 2020.

Kinly is a global provider of AV collaboration services and support. We bring people & technology together in hybrid workspaces, and we employ over 500 people in the UK & Ireland, with a turnover of £71.5m in the 2020 financial year.

Kinly recognises that it has a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic. Kinly is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking by placing the same expectation on suppliers through integrating this into our Terms and Conditions.

The nature of our business requires that we work in conjunction with a range of suppliers such as distributors and original equipment manufacturers sourcing products from leading companies with a proven and established track record in the supply to the audio-visual sector.

Kinly undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Kinly's due diligence and review includes mapping the supply chain broadly to assess products or geographical risks of modern slavery and human trafficking. We require new suppliers confirm they comply with the Modern Slavery Act by paying employees at least the National Minimum Wage and actively take steps to identify and address modern slavery in their own business and supply chains.

Relevant Policies

The following policies exist within our organisation which demonstrate our opposition to modern slavery and human trafficking:

- **Whistleblowing Policy** - Kinly encourages all its employees, customers, and other business partners to report any concerns related to the direct activities or supply chains of Kinly. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Kinly's whistleblowing procedure is designed to make it easy for employees to make disclosures without fear of retribution.
- **Employee Code of Conduct** – Kinly's code of conduct makes clear to employees the actions and behaviour expected of them when representing the Company. Kinly strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Code of Conduct** – Kinly is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with respect and dignity, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their workers working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment Policy** – Kinly 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.

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We undertake the following:

- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- Conducting supplier audits or assessments through the organisation's own staff/third party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Training

We require all Procurement and HR professionals within our organisation to complete an online training course. This course provides the knowledge on how to report, acknowledge and how to handle modern slavery in and around the workplace. Alongside this, it touches upon the Modern Slavery Act 2015 and is CPD Accredited.

The learning outcomes from our modern slavery training are:

- Have an understanding of and work towards compliance with the Modern Slavery Act 2015;
- Have an understanding of what slavery is and various forms that the modern slavery umbrella term covers; and
- Learn what our organisation can do to help get rid of slavery in the UK.

Awareness-Raising Programme

As well as training employees, we shall raise awareness of modern slavery issues by putting up posters across our premises and circulating a series of emails to employees.

The materials will explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Performance Indicators

Kinly measures the effectiveness of this statement by:

- Requiring all new employees to complete an induction in their first two weeks of employment which sets out the issues of modern slavery along with how to identify and prevent modern slavery.
- Requiring all new and existing Human Resources professionals and Procurement Managers to have complete online training on modern slavery
- Requiring all suppliers to confirm they comply with the Modern Slavery Act.
- During the last financial year, we have taken, and are continuing to take, the following steps to address the issue of modern slavery:
 - Identify the areas of risk within our business and supply chains.
 - Review identified risks to revise sourcing procedures.




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- Targeted all new suppliers to confirm their commitment to meeting the requirements of the Modern Slavery Act 2015.
- Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to protected disclosure.
- As well as employee training Kinly has raised awareness of modern slavery issues to other relevant parties within Kinly.
- Highlight what external help is available, for example through the modern slavery helpline.

Kinly will continue to review its policies and procedures in order to prevent slavery and human trafficking from occurring within our business and Supply Chains.

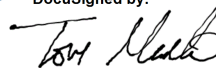
This statement is approved by two directors of AVMI Kinly Ltd who review and update it annually.

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Taj Ghere, Finance Director

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**Tom Martin, Managing Director
Northern Europe**

Date Approved: 01 September 2021