



Heat Pumps | Contracting | Utilities

# MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

## Introduction

Established in 1999, privately owned, and headquartered in Truro, Cornwall, the Kensa Group is a fast-growing collection of award-winning British businesses involved in the manufacture and installation of ground source heat pumps and the ownership of associated underground infrastructure. We serve customers across the UK and abroad with offices in Truro, Exeter and Bradford.

## Policy Statement

We recognise that modern slavery is a global issue, we are committed to playing our part in supporting its eradication and this document outlines the steps we take as a business to prevent slavery and human trafficking in our own operations and supply chain and ensure compliance with the Modern Slavery Act 2015.

We accept our responsibility through due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for Kensa Group Ltd and its subsidiary companies or on these companies behalf in any capacity, including employees, directors, agency workers, contractors, consultants and business partners.

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

We are fully committed to acting ethically and will terminate our relationship with any supply chain partner if they breach this policy and/or are found to have been involved in modern slavery.

## Due Diligence

We recognise that a key risk for some of our group companies will be their supply chain partners and are mindful that some of the industries we operate in include areas of high risk.

To mitigate this risk, where appropriate, our Group companies operate an approved supplier list and conduct due diligence on suppliers/contractors/consultants prior to them becoming approved. Our approval procedure includes due diligence of the supplier covering areas such as professional standing, conformance to the law, compliance with health, safety and environmental standards, qualifications, references and adoption of Kensa's supplier code of conduct. Our approval forms are specific to the disciplines we work with, regularly reviewed and all request signed confirmation of adherence to the Modern Slavery Act.

Our internal recruitment processes are transparent and confirm individuals Right to Work provisions and all employees are paid directly into an appropriate personal bank account.

## Training & Awareness

All new starters to the business are made aware of company policies – including this one – on initial induction. Further training and CPDs are given periodically as refreshers and as policies and/or legal requirements change.

## Further Objectives

This section provides an overview of our objectives in respect to Modern Slavery for the coming year:

Creation of a reporting procedure so any suspected occurrences of modern slavery or human trafficking are investigated and reported to a relevant authority.

Implementation of supply chain Risk Assessments, where appropriate.

Update our supply chain onboarding processes and documentation to include further due diligence.

## Other Policies

We operate a suite of internal policies to ensure that we are conducting business in a fair, ethical and transparent manner. These include:

- Anti-Bribery Policy;
- Code of Conduct Expectations;
- Equal Opportunity, Dignity and Diversity Policy;
- Whistleblowing Policy.