

Modern Slavery Act 2015

Modern slavery and human trafficking statement

Introduction from Kingsway Group Global

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes [our OR our Group's] slavery and human trafficking statement for the financial year ending [DATE].

Organisational structure

We are a manufacturer of anti-ligature doorset and door hardware products for the psychiatric hospitals and other secure establishments across the world.

Kingsway Group Global is the holding company which owns Kingsway Enterprises (UK) Ltd the UK operating company and Kingsway Group, Inc. the US operating company. Each operating company has its own management structure and purchasing authority but then is ultimately governed by the management of the holding company.

We have a global annual head count of around 40 employees who are directly employed and have the rights to work in the country which they are employed in and receive pay in excess of the legal requirement for that country. Employees are given proper employment contracts which clearly stipulate key employment terms, including salary, working hours, holiday entitlement, notice period and other benefits where applicable. Diversity is embraced and the Directors are committed to providing fair and equitable treatment of individuals.

Our supply chains

Our supply chains include: Local manufacturers, same-country fabricators and overseas suppliers for more complex and specialist items. Supply chains are carefully vetted before the trading relationship is established and there is a review system to ensure their continued compliance.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

[Our Modern Slavery and Human Trafficking Policy] [OR] [our workplace policies and procedures] demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

The compliance team is led by the Purchasing Manager.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

Our effectiveness in combating slavery and human trafficking

We will appoint an independent third-party Health & Safety consultancy to conduct an externally facilitated review to bring insights on ways to we can tackle slavery and human trafficking. This company uses [appropriate] KPIs to assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.]

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Enhanced Supply Chain vetting prior to becoming a supplier to Kingsway Group Global
- Additional annual Supply Chain Review checks to ensure on-going compliance.

SIGNED ON BEHALF OF KINGSWAY GROUP GLOBAL



JULIAN HALL (DIRECTOR)

Date: 2nd January 2020