



Modern Slavery Policy

Introduction

Keibra LTD is committed to the global fight against modern slavery and human trafficking. Keibra Ltd understands the devastating impact of these practices on individuals and communities worldwide. This policy provides a clear framework for preventing and combating these practices in all aspects of Keibra Ltd's operations, underpinning Keibra Ltd's commitment to human rights, integrity, social justice, diversity, and inclusion.

Values Statement

Keibra Ltd is guided by its values of accountability, integrity, empathy, and collaboration. To achieve its mission, it is imperative that everyone employed by Keibra Ltd demonstrate honesty, lawfulness, respect, and fairness.

Purpose

The purpose of this Policy is to outline the forms of modern slavery and provide guidelines on their prevention within the Keibra Ltd work force. Modern slavery occurs when vulnerable people are exploited for personal gain or commercial profit. Practices that constitute modern slavery may include:

- Human Trafficking.
- Slavery.
- Servitude.
- Forced Labour.
- Debt Bondage.
- Forced Marriage.
- Child Labour.
- Orphanage trafficking and exploitation of children in institutional care settings.

Scope

This policy applies to all persons working for Keibra Ltd or on Keibra Ltd's behalf in any capacity, including board members, employees, directors, volunteers, interns, contractors, consultants, suppliers, and business partners.

Policy Statement and Principles

This Policy outlines that Keibra Ltd will undertake measures to ensure there are no modern



slavery practices within its business, deployments, and training programs, both nationally and internationally.

Keibra Ltd is guided by principles of equity and social justice, integrity, diversity, inclusion, partnership, and respect for human rights. Keibra Ltd is committed to the prevention of modern slavery across all operations in accordance with the Modern Slavery Act. Keibra Ltd will take action to ensure that new forms of modern slavery can be identified, evaluated, and addressed in compliance with international standards.

Procedures

Keibra Ltd acknowledges that the drivers of modern slavery and human trafficking are closely related with poverty, unequal power dynamics, and gender inequalities. To promote and work towards sustainable development, Keibra Ltd will ensure identification and mitigation of modern slavery risks are parts of organisational safeguarding mechanisms. This includes:

- Conducting an analysis of Keibra Ltd's operations to ensure that no area of business is engaged in modern slavery, including deployees, trainers, contractors, host partners, and suppliers.
- All suppliers to be selected according to the Procurement Policy, which includes reviewing Modern Slavery policies when conducting evaluations.
- Ensuring Keibra Ltd's recruitment practices are robust against modern slavery including participation in the Misconduct Disclosure Scheme.
- Ensuring due diligence checks of partner organisations to ensure they are not engaged in modern slavery or human trafficking.
- Incorporating modern slavery risks within Keibra Ltd's risk, safety, and security processes and reporting.
- Providing appropriate training to all Keibra Ltd personnel on modern slavery and human trafficking.

In the case that there is any instance where personnel believe there may be Modern Slavery occurring, all issues are to be raised to our Modern slavery officer Michael McAteer Michael@Keibra.com.

All issues will be investigated thoroughly, ensuring that all actions undertaken are in line with



the organisations stance on preventing and combating Modern Slavery. These actions will include reporting through any instances of confirmed Modern Slavery to the board and any other relevant stakeholders to mitigate the risk of the practices continuing.

Roles and Responsibilities

Keibra Ltd Board

- Aligns Keibra Ltd's activities with this policy and approves changes to the policy.

CEO/Leadership Team

- Implements the policy, creates a culture that values prevention, manages risk, rectifies issues, and ensures staff receive appropriate training.
- Ensures partners are not engaged in prohibited practices, assesses, and manages risk, and reports concerns to the Leadership Team.

Modern Slavery Officer

- Ensures compliance to the policy
- Ensures that a regular review of the policy is conducted
- Reports through to the board any confirmed Modern Slavery Practices
- Implements recruitment practices that guard against modern slavery
- Provides resources for staff to understand and adhere to this policy and
- Ensures that a regular review of the policy is conducted.

Associate Trainers and Keibra Ltd employees

- Act as ambassadors for this policy in their training programs and deployments, ensuring they are free from modern slavery practices.

All Staff, Volunteers, and Contractors:

- Understands and adheres to this policy, reports concerns, and participates in provided training.



SECURE IN THE KNOWLEDGE

Date of approval 01/08/2024

Signed

Michael McAteer

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Director at Keibra Ltd

Date: 01/08/2024