



MODERN SLAVERY STATEMENT August 2024 - July 2025

This statement applies to Keibra Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year August 2023 to July 2024.

B) ORGANISATIONAL STRUCTURE

Keibra Ltd is an independent training provider offering apprenticeship programmes in the digital industry sector.

Our registered office is at 5-7 New Road, Radcliffe, Manchester, England, M26 1LS

The main activity carried out by the Organisation is the delivery of education to employees engaged in an approved apprenticeship programme.

All operation and management of the Organisation is carried out in the United Kingdom.

C) DEFINITIONS

The Organisation considers that modern slavery encompasses:

Human trafficking;

Forced work, through mental or physical threat;

Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;

Being dehumanised, treated as a commodity or being bought or sold as property;

Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to

complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not have a turnover of above £36 million, hence it is not required to publish an annual modern slavery statement. However, as a conscientious company, the Organisation takes a step further than needed to prevent modern slavery in its business and its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

E) SUPPLY CHAINS

In order to fulfil its activities, the Organisation's main supply chains include those related to the supply of computer equipment, online training materials such as learning platforms.

F) POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist within the activities of the suppliers.

In general, the Organisation considers its exposure to slavery/human trafficking to be extremely low.

Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the

following steps to ensure that modern slavery is not taking place:

Review suppliers on a regular basis, contacting them in the event that the supplier is, or is suspected, to be involved in modern slavery.

Undertake impact assessments of its services upon potential instances of slavery.

Follow action plans to address risk to modern slavery.

Ensure clear actions taken to embed a zero tolerance policy towards modern slavery.

H)

KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

Being an SME allows for additional transparency within the Organisation. Employees are encouraged to report on any potential failings when following the steps to prevent modern slavery.

I) POLICIES

The Organisation has the following policies which further define its stance on modern slavery.



Keibra Ltd recognise that Modern Slavery is a crime and a violation of fundamental human rights.

We are aware that Modern Slavery takes various forms, including 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. Keibra encourage all staff members to monitor the risks of modern slavery, both internally and externally. Reporting on any potential risks or failings.

J) TRAINING

The Organisation provides the following training to staff to effectively implement its stance on modern slavery. Written guidance on modern slavery with the facilities to conduct further reading into the any changes in the Modern Slavery Act.

K) SLAVERY COMPLIANCE OFFICER

Michael McAteer, Director at Keibra Ltd, will be the contact for all concerns regarding modern slavery, and who will then undertake relevant action with regard to the Organisation obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval 01/08/2024

Signed

Michael McAteer

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Director at Keibra Ltd

Date: 01/08/2024