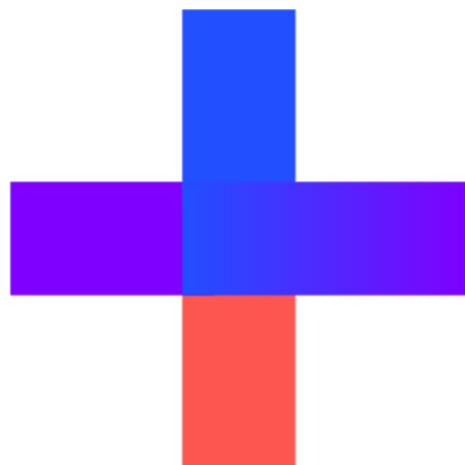




Modern Slavery Statement

Kin and Carta plc

January 2023



## **Modern Slavery Statement**

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**January 26, 2023**

### **Introduction**

Kin and Carta plc and its subsidiaries (hereinafter referred to as "Kin + Carta") are committed to acting responsibly and ethically when conducting business and upholding its responsibility to respect human rights, a foundational principle of the United Nations (UN) 'Guiding Principles on Business and Human Rights' framework that applies to companies.

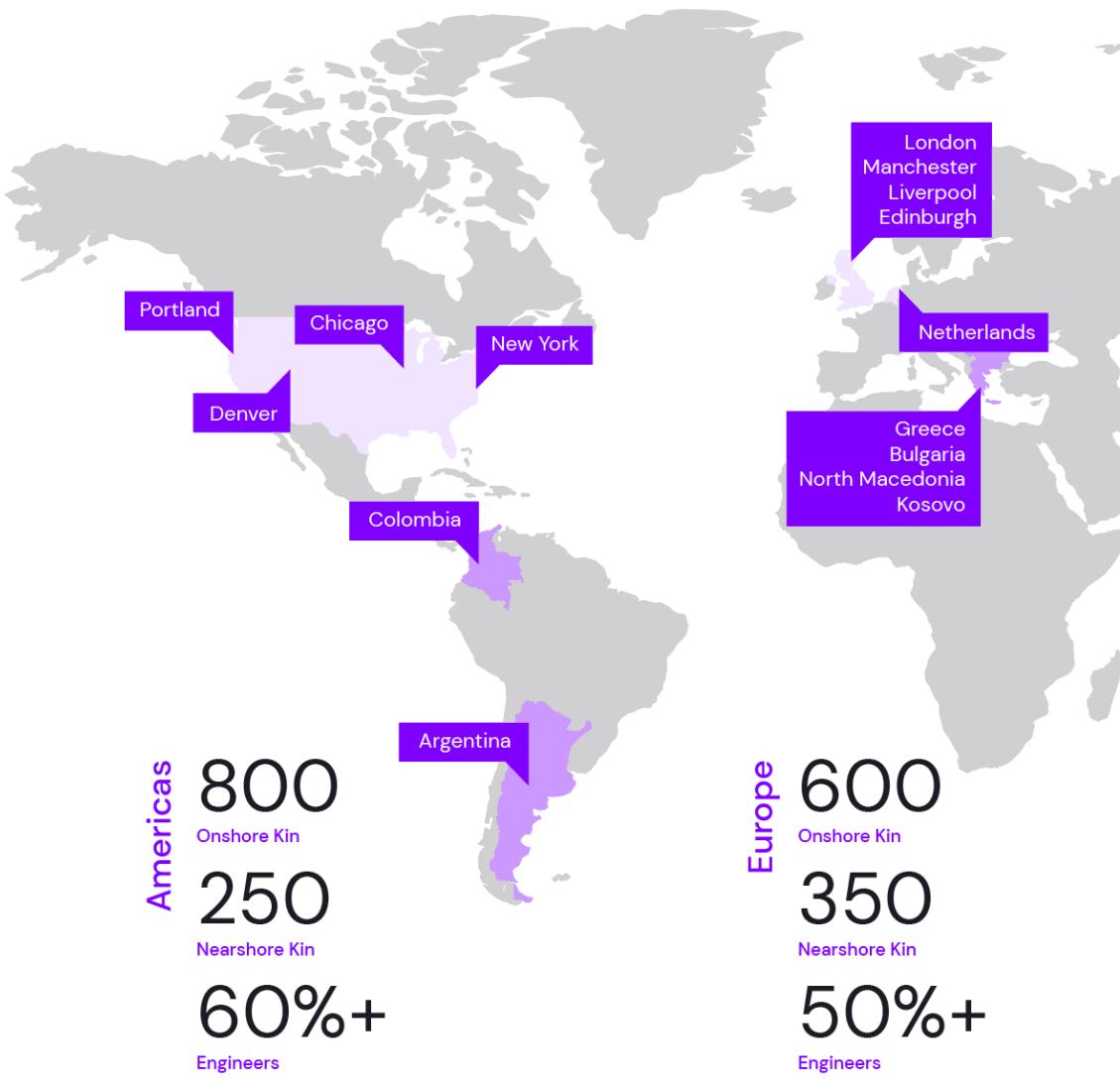
The term "Modern Slavery" which includes slavery, forced labour and human trafficking is a violation of fundamental human rights. Modern Slavery is a global issue and one of the most widespread crimes in the world. Child labour is another world wide issue, where children are being deprived of their childhood, education and dignity. Children are engaged in work that may be dangerous or may cause them harm mentally, physically, socially or morally. We at Kin + Carta believe that every child deserves the rights set out in The United Nations Convention on the Rights of the Child "UNCRC". Therefore, we have a zero tolerance policy toward any form of Modern Slavery or child labour.

### **Our business and structure**

Kin and Carta plc is a London Stock Exchange listed global digital transformation consultancy committed to working alongside clients to build a world that works better for everyone. It operates globally, organised into two regions (Americas and Europe). Its subsidiaries are in the following locations:

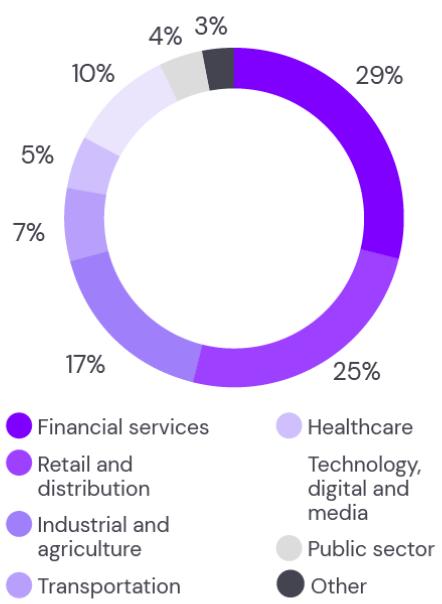
- United Kingdom (Global Headquarters in London)
- United States (U.S Headquarters in Chicago)
- Argentina
- Bulgaria
- Colombia
- Greece
- Kosovo
- North Macedonia

For our financial year ended 31 July 2022, 69% of Kin + Carta's net revenue was generated in the Americas and 31% was generated in Europe. Our revenue is generated from providing digital transformation services to clients operating in a range of sectors, including: financial services, retail and distribution, industrial and agriculture, transportation, healthcare, technology and digital media, and public sector.

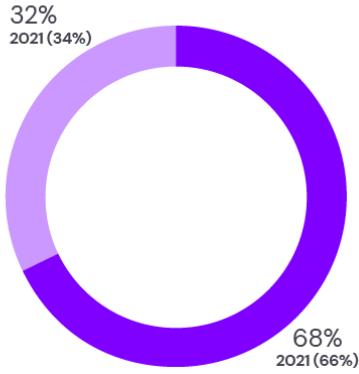


As at July 2022.

**Net revenue by sector<sup>1</sup>**



**Net revenue by region<sup>1</sup>**



FY21 net revenue by Region in brackets

● Americas      ● Europe

<sup>1</sup> Continuing operations only. Continuing operations exclude the results of Incite Marketing Planning Limited, Incite New York LLC, Edit Agency Limited, Relish Agency Limited, The Health Hive (US) LLC, The Health Hive Group Limited and subsidiaries, and Pragma Consulting Limited (note [5]).

Net revenue by sector and net revenue by region as at 31 July 2022.

Kin + Carta's 2,000 consultants, engineers, and data scientists around the world bring the connective power of technology, data, and experience to the world's most influential companies – helping them to accelerate their digital roadmap, rapidly innovate, modernise their systems, enable their teams, and optimise for continued growth. The borderless model of service allows for the best minds to be connected to collaborate on client challenges.

With purpose at its core, Kin and Carta plc became the first company listed on the London Stock Exchange to achieve B Corp certification. It meets high standards of verified social and environmental performance, public transparency, and accountability to balance the triple bottom line of people, planet, and profit.

## Our supply chains

Due to the nature of our business, most of our companies have relatively straightforward direct supply chains, with the majority of products and services sourced from suppliers based in the European Union, Latin America, United Kingdom and United States. Our supplier base is predominantly providers of software as a service solutions. However, some of our suppliers may have extensive supply chains, connecting us with many businesses worldwide.

We are committed to doing business responsibly and acting ethically so it is a necessity to us that our suppliers share our commitment to human rights and the prevention of Modern Slavery and child labour within their enterprise and wider supply chains.

### Risk assessment, risk management and due diligence

In assessing Kin + Carta's risk of exposure to Modern Slavery or child labour in its supply chains, we have considered our supplier base and external data regarding high risk industries. While every industry is susceptible to Modern Slavery, it is noted that the majority of forced labour victims work in domestic work, construction and agriculture<sup>1</sup>. We have a limited number of suppliers in these industries, primarily associated with office services (e.g. cleaning contracts, maintenance).

We have systems and procedures in place to identify, monitor and mitigate the risk of Modern Slavery and child labour occurring in our supply chains.

These systems are:

- Our supplier selection and retention processes, which are supported by our Supplier Code of Conduct. Our Supplier Code of Conduct is intended to ensure that key suppliers comply with our mandatory requirements related to their treatment of employees, health, safety and environment, which sets our expectations of how they will conduct business and the standards of ethical behaviour we expect. It requires their adherence to comply with all applicable local and international laws and regulations, including the Modern Slavery Act in the UK. Our Supplier Code of Conduct assessments ask our suppliers to confirm that they comply with all applicable human rights and equity laws, and laws prohibiting slavery or human trafficking, and that they adhere to policy of our zero tolerance towards Modern Slavery and child labour.
- Key suppliers are requested to confirm acceptance of our Code of Ethics which requires compliance with applicable Modern Slavery laws and prohibits of any form of child labour, these are also mandatory requirements of our the Supplier Code of Conduct.
- We have local Human Resource and Employee Experience functions across Kin + Carta to address employee matters and provide formal recruitment processes, which include pre-employment checks. For our UK based businesses, this includes processes to ensure that employees have the right to work in the United Kingdom and compliance with the National Living Wage.

We will terminate our relationship with clients, suppliers and other business partners (including acquisition targets) when their business conduct is deemed to be a violation of the Modern Slavery Act or Child Labour laws, including but not limited to the Conventions re Minimum Age Convention, 1973 (No. 138) and Worst Forms of Child Labour Convention, 1999 (No. 182) as set out in International Labour Organization ("ILO") Fundamental Conventions. We are also committed to protecting any whistleblowers who bring victims of Modern Slavery or child labour to light and/or call out the actions of people that facilitates or conceals these activities.

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<sup>1</sup> Stop the Traffik (2023): <https://www.stopthetraffik.org/what-is-human-trafficking/definition-and-scale/>

## Our policies

Kin + Carta will not knowingly do business with any organisation (including acquisition targets) or body involved in Modern Slavery or child labour. Accordingly, during the year Kin + Carta developed a Modern Slavery Policy that applies to our staff, clients, business partners and suppliers. The policy explicitly states Kin + Carta's zero tolerance approach to Modern Slavery and child labour and provides a reference point when assessing and managing relationships with those key stakeholders.

In addition, our commitment to mitigating the risk of Modern Slavery and child labour within Kin + Carta's supply chains is reinforced by the following policies of Kin + Carta:

- Code of Ethics: this reiterates our commitment to preventing Modern Slavery and our employee's duty to operate in line with our policies and procedures and to adhere to applicable laws and regulations, including the Modern Slavery Act 2015. It also reiterates our values, which are: "to be deeply connected, instinctively compassionate and always courageous". These values provide a supportive organisational culture to ensure we can conduct our business practices responsibly so that our employees can confidently raise any concerns to help prevent Modern Slavery or child labour.
- Supplier Code of Conduct: this policy is in place for Argentina, the UK and US. It sets high mandatory standards and behaviours required from our suppliers related to their treatment of employees, health, safety and environment, conduct of business and ethical standards of behaviour. It also provides supportive desirable behaviours to encourage improvements in practices (e.g. supplier commitments to paying the living wage). It is a mandatory requirement of the policy that suppliers comply with all applicable human rights and equality laws and laws prohibiting slavery and human trafficking.
- Whistleblowing Policy ("Speak Up"): this is available to all employees. The Speak Up policy outlines the procedures and channels for our people to confidentially raise any concerns about suspected misconduct without fear of retaliation. Any matters raised through the channels outlined in the Speak Up policy are reported to the appropriate body, which may include:
  - the Kin and Carta plc Board of Directors and/or relevant subsidiary board with a view to an internal investigation;
  - an appropriate external regulatory body for investigation; or
  - the police.

These policies are available [here](#).

## Awareness and training and outcomes

Kin + Carta has developed training and guidance regarding Modern Slavery which has been disseminated globally to all staff including to key our procuring teams (Human Resources ("Employee Experience"), Office Experience and Procurement). The training includes the International Labour Organisation ("ILO") indicators of forced labour such as abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity

documents, withholding of wages, debt bondage, abusive working and living conditions or excessive overtime in order to educate its workforce on key indicators that would warrant urgent investigation. The training is designed to help our employees understand, detect and know how to report Modern Slavery, Kin + Carta's has a zero-tolerance policy toward any form of these acts. It also provides information on the systems Kin + Carta has embedded to manage risk and ensure appropriate investigation and reporting of any concerns related to a violation of a policy. There have been no reports of finding any ILO indicators during the year.

### Progress over time in addressing Modern Slavery risks: Goals and KPIs

During the period of the statement Kin + Carta focused on the following priority risks and goals:

- Risk that employees do not understand key indicators of Modern Slavery or how to report concerns, this risk has been further mitigated by the development and dissemination of training tools for employees.
- Risk involving due diligence in the operations and supply chains, progress has been made to mitigate this risk by ensuring each supplier that came to the supplier management process completed the Supplier Code of Conduct assessment form and logging the status in our internal ticketing system to minimise the risk of oversight.
- Risk of ambiguity in our approach to Modern Slavery was mitigated by introducing a Modern Slavery Policy (see "Our policies" above for more information).

Future focus areas:

- Incorporate mandatory training to employees with organisation wide on-boarding, which includes a monitor of completion metrics so that a KPI can be established.
- Create a single Supplier Code of Conduct that applies to all locations and enhance visibility on the completion metrics for the corresponding questionnaire so that a KPI can be established.
- Update Kin + Carta global policies to ensure there are references to Modern Slavery when appropriate.

### KPIs

The future focus areas referenced above will allow us to report on key performance indicators (KPIs) going forward related to training and supplier questionnaires. These KPIs will help to inform us of the effectiveness of the steps we are taking to ensure that there is no known Modern Slavery in our operations, supply chains or customer and client relationships.

This policy statement concerning Modern Slavery is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Kin and Carta plc.

Kelly Manthey  
Chief Executive Officer, Kin and Carta plc

January 26, 2023