



HSEQ-PD-019 – MODERN SLAVERY POLICY

Purpose

Keece Group and its associated entities are committed to preventing modern slavery and human trafficking in all aspects of our business. This policy outlines our approach to ensuring that modern slavery does not occur within our operations or supply chains. To that effect Keece commits to:

- Acting ethically and with integrity in all business dealings.
- Implementing and enforcing effective systems and controls to prevent modern slavery.
- Ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.
- Complying with all applicable legislation related to modern slavery and human trafficking.

Scope

This policy applies to all employees, contractors, suppliers, and other business partners of Keece Group.

The following human functions are in place for this policy:

- **Modern Slavery:** Includes slavery, servitude, forced and compulsory labour, and human trafficking.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, force, coercion, abduction, fraud, or deception for the purpose of exploitation.
- **Forced Child Labour:** Child labour refers to work for children under the age of 18 that is mentally, physically, socially and/or morally dangerous or harmful and that interferes with their schooling

Responsibilities

- **Senior Management:** Ensure the implementation and enforcement of this policy.
- **Managers:** Monitor and review operations and supply chains to identify risks of modern slavery.
- **Employees:** Adhere to the policy and report any concerns regarding modern slavery.

Training and Awareness

- Provide training to employees to ensure they understand and comply with this policy.
- Raise awareness about modern slavery issues within our organisation and supply chains.

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Document No: HSEQ-PD-019	Revision Date: 03/2025	Authorised by: Gerard Lyons



Risk Assessment and Due Diligence

Keece will:

- Conduct and review an annual risk assessments to identify parts of our business and our supply chains where there is a risk of modern slavery (HSEQIS-REG-007 Business Risk and Environment Aspects Register) may exist and control measures to reduce likelihood.
- Evaluate potential risks associated with new suppliers and partners.
- Conduct due diligence on existing suppliers and business partners.
- Progressively require all suppliers to confirm their adherence to this policy and their efforts to combat modern slavery.
- Ensure student educational work experience that has been approved by Keece will be in line with international standards and local applicable law and is not considered child or forced labour. Keece will obtain a formal agreement from the educational provider which will outline tasks they will undertake and working hours; see HSEQ-SOP-025 - Work Experience Policy and Procedure

Monitoring, Review and Compliance

- Regularly monitor and review our practices to ensure they are effective in combating modern slavery.
- Update this policy as necessary to reflect changes in legislation and best practices.
- Keece will not tolerate any instances of modern slavery. Non-compliance with this policy will result in disciplinary action, which may include termination of contracts with suppliers or employees.

Reporting and Whistleblowing

- We encourage employees and business partners to report any concerns about modern slavery.
- Provide a confidential whistleblowing mechanism for reporting such concerns. Access to this process is via Keece Teams | Forms | Whistleblower.
- Ensure that reports are taken seriously and investigated promptly.

Communication

- Communicate this policy to all employees, suppliers, and business partners.
- Make this policy available to the public via our website.

Records

Keece Group shall maintain all records as stipulated in the **Keece Group** HSEQ Manual.

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