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Kukla UK's Modern Slavery and Human Trafficking Policy Statement

Definitions:

Kukla UK considers that modern slavery encompasses:

1. Human trafficking
2. Forced work/labour either through mental or physical threats
3. Servitude - being owned or controlled by an employer, through mental or physical abuse of the threat of abuse
4. Slavery - being dehumanised, treated as a commodity or being bought or sold as property. Being physically constrained or having restrictions place on them to stop freedom of movement.

Introduction

This statement sets out the actions that Kukla UK undertake, to understand all the potential modern slavery risks related to its business and the steps it has put into place that are aimed at ensuring there is no slavery or human trafficking in its own business or its supply chains.

This statement relates to actions and activities during the financial year January to December.

The following is the process we undertook to assess whether particular activities or countries are high risk in relation to slavery or human trafficking.

As part of the transport and warehousing sector in the UK, Kukla UK recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Kukla UK has a zero-tolerance approach to slavery, trafficking or forced labour in any part of its business and ensures that its supply chains are free from slavery and human trafficking.

Commitment

We acknowledge our responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Kukla UK understands that this requires an ongoing review of both its internal practices in relation to its labour force and additionally, its supply chains.

Kukla UK does not undertake business with any other organisation, in the United Kingdom or elsewhere, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Kukla UK in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. We strictly adhere to the minimum standards required in relation to our responsibilities under all relevant employment legislation in United Kingdom.

Supply Chains

Kukla UK operates in the UK, whilst we might handle products imported or exported by our customers, there is little to no scope for any of our direct activities to be exposed to slavery or human trafficking.

Potential exposure

Our main exposure to the risk of slavery/human trafficking is deemed to be relatively limited. Nonetheless, Kukla UK has taken steps to ensure to the best of its ability that such practices do not



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take place in its business nor the business of any organisation that supplies goods and/or services to it.

Impact of COVID-19

The COVID-19 pandemic has not adjusted the risk of modern slavery to a level above that which existed before the pandemic.

Responsibility

Kukla UK are committed to ensuring that its suppliers and contractor adhere to the highest standards of ethics. Suppliers and contractors are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Kukla UK works with its suppliers and contractors to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the supplier code of conduct will lead to the termination of the business relationship.

Kukla UK undertakes due diligence when considering taking on new contracts and annually reviews its existing contracts.

Responsibility for the anti-slavery initiatives is as follows:

- **Policies:** The Human Resources Department are responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** The directors are responsible for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** The directors are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking and explain their specific role.
- **Training:** The directors lead the way for staff development and training.

Training and Awareness

Kukla UK recognises that knowledge is critical, and all its employees must complete the mandatory Modern Slavery training upon starting their employment and commit to preventing labour exploitation by completing their new starter induction. The new starter induction includes the following:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

Policies

- Whistleblowing Policy
- Anti-slavery and Human Trafficking Policy compliant with the Modern Slavery Act 2015
- Child Labour Policy
- Recruitment Policy



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Slavery Compliance Officer

Kukla UK's Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the our obligations is ?

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

Signed by:

Position: Commercial Director
Date 1 January 2022