# Modern Slavery and Human Trafficking Statement

# 2026

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## Introduction

This statement sets out KMG Systems Ltd ("KMG") actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

We realise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and workplace abuse. From this point onwards we will use the expression "slavery and human trafficking" to encompass these various forms of coerced labour.

This statement relates to actions and activities undertaken during the year ending 2025 (1st January 2025 to 31st December 2025) and reiterates KMG's commitment to human rights and its perseverance in performing actions and activities aimed at reducing any potential modern slavery and human trafficking risks related to its business, its supply chain and its operations.

As an original equipment manufacturer for the snacks industry, KMG recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships.

## Organisational Structure, Core Business and Supply Chains

KMG Systems Ltd is incorporated in the UK and has no subsidiaries.

KMG is a global leader in the design and manufacture of equipment for the snacks and cereals industry.

KMG Systems Ltd has an annual turnover in excess of £30M.

Our supply chain includes diverse products including raw materials, subcontract services, electrical products and consumables principally related to our core business.

## Policies

### Code of Conduct

KMG always conducts services honestly and honourably and expects its customers and suppliers to do the same. KMG is committed to maintaining the highest degree of integrity in all dealings with potential, current and past customers, both in terms of normal commercial confidentiality, and the protection of all personal information received in the course of providing the business services concerned.

KMG's commitment is formalised in the above-mentioned Code of Conduct.

We extend the same standards to all customers, suppliers and associates.

Our actions and advice will always

- conform to relevant law;
- avoid causing any adverse effect on ethical trade or the human rights of people in our own organisation, the organisations we deal with, the local and wider environments, and the wellbeing of society at large.

All activities are conducted professionally and with integrity, taking great care to be completely objective in the judgment and any recommendations given, so that issues are never influenced by anything other than the best and proper interests of our customers.

We always strive to be fair and objective in advice given and actions, decisions, and recommendations, are not influenced by gender, race, creed, colour, age or personal disability.

It is the belief of the business owners that the achievement of our quality objectives will demonstrate our commitment to providing excellent service, ensuring customer needs and expectations are being continually met and where practical exceeded in line with the Code of Conduct.

## Supply Chain Policy

Our supply chain includes diverse products including raw material, subcontract services, electrical products and consumables principally related to our core business.

Our suppliers are not based in geographical areas renowned for alleged human rights violations or are in any other ways implicated in alleged human rights violations.

We are strongly committed to conducting our business in a lawful and ethical manner, including engaging with suppliers that are committed to the same principles.

For this reason we require suppliers in our manufacturing supply chain to comply with our Supplier Code of Conduct which focuses on some key areas like:

- Compliance with laws,
- Human rights and in particular child labour, human trafficking and forced labour
- Fair and ethical employment practices
- Protection of the Environment as well as Health and Safety of staff, visitors and others who might be involved with business activities
- Compliance with anti-corruption laws
- Fair competition
- International trade compliance in all its aspects
- Personal Data Protection

## Recruitment and Selection Policy

The Resources Director is responsible for putting in place and reviewing KMG's Human Resources polices. KMG's employment practises are fair, compliant with current legislation and reflecting best business practise.

The purpose of the Recruitment and Selection Policy is to assist KMG in finding the best and most talented individuals to fill its vacancies in a timely and efficient manner. This policy sets out the process and rationale for recruitment and selection at KMG, illustrating how resourcing is managed fairly and consistently throughout the business, ensuring that these practices are lawful, balanced and impartial.

The vast majority of our employees are engaged directly with the company on employment contracts. We use contractors only occasionally to fulfil peaks in demand. Staff are recruited based on their skills, qualifications, experience, potential and motivation.

KMG always strives to be fair and objective in advice given and KMG's actions, decisions, and recommendations, are not influenced by protected characteristics identified by the Equality Act 2010

, regardless of gender, race, ethnic origin, sexuality, religion, marital status, age or disability.

Many of our new employees approach the company directly via our website.  We also use a managed group of specified and reputable employment agencies to source labour.

### Personal Harassment Policy & Procedure

KMG is committed to providing a working environment that ensures that all employees are treated fairly, equally and decently. We believe that everyone has the right to be treated with dignity and respect.

Harassment or bullying can cause fear, stress, anxiety and it can, therefore, affect job satisfaction and an individual's morale. We regard any form of harassment and bullying as totally unacceptable behaviour and we will not permit or condone it in any form.

Everyone has a personal responsibility for their own behaviour and a duty of care to treat each other with dignity and respect. This includes individuals being aware of the appropriateness of their conduct, making sure that their own behaviour does not cause offence or misunderstanding. Furthermore, we encourage any employee who witnesses a conduct contravening the Personal Harassment Policy & Procedure to report it to their manager or director.

## Risk Assessment

KMG did not identify any modern slavery risks in our operations or supply chains during the period of the statement.

## Due Diligence

The Resources Director is responsible for putting in place and reviewing KMG's Supply Chain policies. KMG undertakes due diligence when considering taking on new suppliers, and thereafter, monitors and annually reviews risks related to its suppliers.

This is done by:

- broadly mapping the supply chain in order to assess particular products or geographical risks of modern slavery and human trafficking

- evaluating the modern slavery and human trafficking risks associated to each new supplier
- reviewing on a regular basis all aspects and risks associated to the supply chain
- continuously monitoring our suppliers through reputable compliance databases
- conducting supplier audits

If necessary, KMG would invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, which may result in the termination of the business relationship.

Investigations/due diligence: Purchasing team, with the support of the Managing Director, are responsible for investigations and due diligence in relation to any known supply chain compliance issues including any suspected instances of slavery and human trafficking.

## Training

All staff have access to our People and Supply Chain polices via our intranet site. New employees are instructed to read information relating to these policies as part of the induction process. HR and Purchasing personnel receive more in-depth training in the relevant subject areas according to their job role. Both directors have been involved in the drafting of these policies and this Statement.

## Performance Indicators

KMG has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015 and has put in place the following measures:

- Require all staff working in Purchasing and HR professionals to have read this document.
- Maintain the system for supply chain verification, whereby KMG will evaluate potential suppliers before they enter the supply chain; and
- Review its existing supply chains, whereby KMG will evaluate all existing suppliers.

## Board Approval

This statement has been approved by the KMG's board of directors, who will review and update it annually

*Helen Weatherley*

Helen Weatherley
Managing Director
**KMG Systems Ltd**