



BECOME GREATER

Modern Slavery Policy

Document Version 4.0

Contact

Phone: 0800 044 5009
Email: hello@kocho.co.uk
Website: kocho.co.uk



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Identification

| File Name | Owner |
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| Modern Slavery Policy | Head of Governance & Sustainability |

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| 3.0 | Head of Sustainability & Compliance | 15/04/2024 | Annual review: → Dates in Section 1 updated; → Structure of Section 6 updated. |
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Reviewers/Authorisers

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1 Introduction

This Policy has been published in accordance with the UK's [Modern Slavery Act 2015](#) (specifically Section 54¹) and with reference to the UK Government's *Transparency in Supply Chains Statutory Guidance*². It details the steps that will be taken by Kocho Group during the financial year ending 5th April 2026 to prevent modern slavery and human trafficking in its business and throughout its supply chain.

Kocho is committed to operating ethically and honestly in all its business dealings and takes a zero tolerance approach to any form of modern slavery or human trafficking. Kocho is fully committed to preventing slavery and human trafficking in our operation and supply chain focusing on the following objectives:

- Ensuring that consideration of modern slavery risks and prevention are added to key policy review processes as an employer and procurer of goods and services.
- Ensuring that all employees, including those involved in buying/procurement and the recruitment and deployment of workers, receive training on modern slavery and ethical employment practices.
- Providing awareness training to employees on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.

The Head of Governance & Sustainability is the owner of this Policy and undertakes a review of the Policy with the People Director on at least an annual basis.

2 Organisation Structure and Supply Chains

Kocho is a company incorporated in England providing identity, cyber security, cloud transformation and managed IT services. We operate from offices in London and Cardiff in the UK, and Cape Town in South Africa.

We establish a relationship of trust and integrity with all our suppliers. Our supplier onboarding and ongoing review processes include due diligence of a supplier's reputation, ethics, security and compliance with regulatory standards.

To date, we have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers but if we were, would take robust action against that supplier.

¹ Section 54 requires that any commercial organisation in any sector, which supplies goods or services, and carries on a business or part of a business in the UK, and has a turnover of £36 million or more, must produce a modern slavery statement for each financial year of the organisation.

² UK Government Home Office: Transparency in Supply Chains (TISC) Statutory Guidance, updated 27th March 2025.



3 Organisational Policies

To demonstrate compliance with the legal requirements of the Modern Slavery Act, Kocho does the following:

- We update this Modern Slavery Policy at the start of each financial year and the Policy is made available to all employees via the Kocho intranet.
- The Modern Slavery Policy is approved by the Board of Directors and signed off by a member of the Kocho Executive Board.
- We also publish a [Modern Slavery Statement](#) on the Kocho website.

The following documents are in place to support employees in the reporting of any concerns. All documents are included in the annual review schedule to ensure they remain up to date with changes in legislation:

- **Employee Code of Conduct:** The Kocho code of conduct encapsulates the three values of 'Do what's right', 'Think greater' and 'Better together' and encourages our employees to exhibit the highest standards of conduct and ethical behaviour when representing our company or managing our supply chain.
- **Whistleblowing Policy:** Kocho is committed to ensuring that no employee will suffer any repercussions from reporting any suspicion of slavery or human trafficking. To this end, the *Whistleblowing Policy* is available to all employees and details how they can report any suspicions without fear of retaliation.
- **Supplier Code of Conduct:** Kocho's *Supplier Onboarding Process* makes specific reference to slavery and human trafficking, and requires our suppliers to commit to the same high standards of conduct and behaviour that we expect of our employees. Kocho does not do business with suppliers who cannot commit to such an undertaking.
- **ESG Policy:** The *Environmental, Social and Governance Policy* available to all employees and to clients on request details the underlying principles governing how Kocho operates.

4 Assessing and Managing Risk

Risks associated with modern slavery are managed via the Kocho risk management framework, which helps determine our response and the controls that we implement. Risk reviews are held on a monthly basis to enable new risks to be assessed and existing ones treated.

Where an employee suspects an instance of slavery or human trafficking, they must immediately report it to their Line Manager, the Head of Governance & Sustainability or a member of the Senior Leadership Team.

5 Supplier Due Diligence in Relation to Modern Slavery

Kocho's *Supplier Onboarding Process* makes specific reference to slavery and human trafficking in the due diligence questionnaire submitted to potential new suppliers. Due diligence in this area is also part of the ongoing reviews of our existing suppliers.



In particular, we ask our key suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour;
- Their employees work voluntarily and are entitled to leave work;
- Each employee is provided with an employment contract that contains a reasonable notice period for terminating their employment;
- Employees are not required to post a deposit/bond and their salary is not withheld for any reason;
- Employees are not required to surrender their passports or work permits as a condition of employment with that supplier.

6 Awareness and Training

This Policy has been published to the 'Corporate Compliance Policies' area of the Kocho intranet, where it is available to all Kocho employees who must familiarise themselves with its contents.

Awareness of this Policy forms part of the induction training received by each new employee to Kocho.

In addition to the awareness steps detailed above, all employees receive a training course as part of their annual training programme covering the following:

- The size of the problem and the risk to our organisation;
- Defining modern slavery and examples of how people can be held and exploited;
- How employees can identify the signs of slavery and human trafficking;
- How employees should respond if they suspect slavery or human trafficking.

7 Monitoring and Evaluation

The following improvement areas have been identified as part of Kocho's monitoring and evaluation of its response to this subject:

1. Although the *Supplier Onboarding Process* already contains questions around modern slavery, we recognise that the breadth of these questions could be expanded and strengthened to improve onboarding due diligence.
2. The ongoing supplier review process could also be further improved. To achieve this, an analysis will be conducted of all existing suppliers to ensure that the same level of due diligence has taken place across the board, and steps will be taken to clarify and obtain assurances from these suppliers as to their policy and the actions they are taking to protect against modern slavery.
3. Kocho will also be introducing steps to ensure 100% compliance from its employees in the completion of their modern slavery training, through the use of a KPI placed on each employee.
4. Outcome focused business KPIs will also be introduced to measure progress towards these improvements.
5. Kocho will also look to fully align with the Organisation for Economic Co-operation and Development (OECD) and UN Guiding Principles (UNGPs) guidelines as part of its wider ESG strategy.

About Kocho

At Kocho, we believe greatness lies in everyone.

That's why we exist. To help ambitious companies realise their potential.

We combine Microsoft cloud technology with identity, mobility, and security solutions, to transform your organisation.

And we're with you every step of the way. Because the path to greatness isn't walked alone.

The result? A unified and secure technology solution, that underpins growth and amplifies your business success.

Kocho. Become greater.



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Better
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0800 044 5009