# Modern Slavery Statement

## Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It continues to be a priority for Kiplun Limited (**Kiplun**) to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

Of Kiplun's wholly owned subsidiaries, this statement covers the activities of Pickerings Europe Limited.

## Our business

Kiplun is a holding company for a corporate group structure (**Group**). The principal activities of the Group are the installation, service, repairs and modernisation of lifts, loadings systems and escalators and supply of associated products. In addition, the Group has a majority shareholding in a cyber security company and operates high specification country houses. We have over 400 employees and operate in the UK. Our staff are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in this country. Our focus is therefore to ensure there are policies and procedures in place for our contractors and suppliers.

We have an annual turnover of £59 million.

## Our policies

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies. We have a number of policies to ensure we are conducting business in an ethical and transparent manner. These include:

- Modern Slavery policy –
- Fraud, Anti bribery & corruption -
- Code of Conduct -
- Safeguarding policy -
- Whistleblowing policy -
- Pre-employment checks –
- Prevention of illegal working –

Our Company core values can be found on the Company corporate website www.pickeringslifts.co.uk

## Our supply chains

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains and to act ethically and with integrity in all our business relationships.

Our supply chains are predominantly UK based although we do also import from Europe, and to a lesser level the US/Canada. Supplier due diligence is undertaken as part of our new supplier process, which includes checking against corporate databases and consideration of the geographical risks of modern slavery.

**Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk, we insist on proof of identity and eligibility to live and work in the UK prior to any offer of employment being made. If, for any reason, this is not possible at the interview stage, then the necessary documents must be presented and verified before employment commences. If the documents are not checked and verified, the individual will not be permitted to start employment. This will be in line with any applicable Home Office guidance in force at the time the offer of employment is made.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

**Supplier adherence to our values and ethics**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics we have in place a supply chain compliance programme. This consists of due diligence as part of our new supplier process as set out above.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Audit and compliance.
- Human resources.
- Procurement.
- Sales.

**Our effectiveness in combating slavery and human trafficking**

We use the following key performance indicators (**KPIs**) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

Training & Awareness building;

All budget holders and relevant employees; Regional Management, Procurement team, Leadership Team and department Managers with procurement responsibilities to have completed training in modern slavery in the supply chain.

Due Dilligence;

Evaluate modern slavery and human trafficking commitment and policies of each new supplier through our approval process.

**Future steps**

Over the course of the next financial year we intend to take the following further steps to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers:

Monitor and continue to deliver supply chain risk and modern slavery online training across the business to budget holders and relevant employees including refresher training.

Review of vetting procedures for our existing preferred subcontractor and supply chain.

This statement constitutes the Group's slavery and human trafficking statement for the financial year ending 31st December 2025. It was approved by the board on June 2026.

Paul Brooks

Director of Pickerings Europe Ltd

Date: 15.06.26