

Modern Slavery Act 2015

Modern slavery and human trafficking policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Beate Kubitz Associates Ltd has a zero tolerance approach to modern slavery and is committed to improving company practices to combat slavery and human trafficking and ensure that there is no modern slavery or human trafficking in its supply chains or any part of this business. I have taken concrete steps to tackle modern slavery, as outlined in this statement. This statement sets out the actions taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2020-21.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015.

About the company:

Beate Kubitz Associates Ltd is a company registered in England. It provides research, analysis, information and communication in the transport and mobility sector in the UK and Europe.

Who this policy applies to:

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels including agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Beate Kubitz Associates Ltd strictly prohibits the use of modern slavery and human trafficking in operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

Beate Kubitz Associates Ltd expects that their suppliers will hold their own suppliers to the same high standards.

Supply chains and business:

As a company, Beate Kubitz Associates Ltd establishes a relationship of trust and integrity with suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references

Company supply chains include:

- Office and administrative services including information and communications technology, office rental, print
- Outsourced services such as design, support and accountancy
- Travel and transport.

As such, no allegations of human trafficking/slavery activities against any of our suppliers have been received, but should this be the case, then I would act immediately against the supplier and report it to the authorities.

Our policies on slavery and human trafficking:

This Modern Slavery and Human Trafficking Policy is intended to demonstrate my commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in my supply chains.

I am committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of this business.

Due diligence processes for slavery and human trafficking:

As part of our initiative to identify and mitigate risk we use suppliers who adhere to UK and EU legislation. We do not use suppliers or partners where we suspect they do not comply with the law.

As a small business this approach enables me 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.

In the event of an incident where modern slavery is suspected it must be reported to the police. Such incidents might include a supplier which is suspected of:

- Using any form of forced, compulsory or slave labour
- Forcing employees to work (eg not attending voluntarily or not entitled to leave work)
- Not providing each employee with an employment contract that contains a reasonable notice period for terminating their employment
- Requiring employees to post a deposit/bond or withholding their salaries for any reason
- Requiring employees to surrender their passports or work permits as a condition of
- Employment

Training:

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, any future staff will be trained on this policy in the future.

Awareness:

This Modern Slavery Policy is displayed on beatekubitz.com

Further steps:

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Monitor media to ensure no suppliers are breaking EU and UK laws on modern slavery.
- Train any future staff to ensure awareness of, reporting on and action taken against modern slavery.
- Raise any concerns with suppliers and partners if they arise
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This statement covers 1 July 2022 to 30 June 2023.



Beate Kubitz Associates Ltd

January 2020 / updated June 2022