

# Modern Slavery and Human Trafficking Statement

For the financial year ended 31 December 2022

This statement is made by Kernel Ltd on behalf of all companies and brands within the Kernel Group which includes Dartmouth Partners Ltd and Pure Recruitment Group Ltd (together 'Kernel').

## Introduction

We do business differently, putting people and relationships first. Honesty, trust and kindness set us apart and allow us to create an exceptional, human experience. We therefore take a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## Kernel's structure and business

Kernel Global is a multi-brand, multi-niche, high quality recruitment ecosystem that harnesses the power of human aspiration, human inspiration, and human application. Kernel invests globally in high-potential recruitment businesses across a spectrum of sectors and specialisms. Our mission is to create and nurture the ideal environment of expertise, investment, infrastructure, and innovation in which our brand partners can grow to become exceptional.

Kernel has around 280 employees operating across our offices in the UK, the US, Hong Kong, Germany and France. Kernel has a dedicated Legal, Compliance and Company Secretarial functions to ensure compliance with legal and regulatory aspects of trading in the UK and internationally, including modern slavery.

## Our policies

It is our people that make us. Kernel is home to exceptional individuals with the knowledge, insight, and mindset to help our partner businesses become exceptional. At Kernel, we live and breathe our values; Excellence, Kindness, Change, and Growth. We respect and encourage entrepreneurial flair whilst supporting our leaders with guidance and governance structures appropriate to the nature and scale of our business.

Our Anti-Slavery and Human Trafficking Policy (the 'Policy') underpins our commitment to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. The Policy provides information and guidance to those working for and on our behalf on how to recognise and deal with modern slavery and human trafficking issues. Specifically, it outlines the responsibilities of all employees to prevent, detect and report any concerns of modern slavery or human trafficking in any part of our business or supply chain. The Policy also reflects our commitment to ensure all concerns raised regarding modern slavery or human trafficking will be handled sensitively and appropriately.

The Policy is supported by our Whistleblowing Policy, which provides detailed information and guidance for employees on how to raise a concern, the process that will be followed when concerns are raised, and reassurance that those who raise genuine concerns in good faith can do so without fear of reprisals, even if they turn out to be mistaken. We have effective systems in place to investigate any concerns raised under these policies, and no slavery or human trafficking concerns have been raised to date.

We continuously review and update all our policies.

## Kernel's Supply Chains

Our supply chain is comprised of suppliers who provide goods and services to Kernel, as well as those who are involved in the services we provide to our candidates and clients, including umbrella and payroll management companies, other recruitment agencies and workers who provide services via limited companies or as a self-employed consultant.

Consistent with our zero-tolerance approach, we expect high standards from all our contractors, suppliers and other business partners and, as part of our onboarding processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children; we expect that our suppliers will hold their own suppliers to the same high standards. Specifically, we expect our suppliers to support the principles of the UN Global Compact, which is committed to 10 universally accepted principles, which includes human rights, labour, and anti-corruption. We will not work with any supplier organisation that has been found to have knowingly been involved in slavery or human trafficking. During the year to 31 December 2022, as part of our continuous improvement approach, we updated our standard terms of business to include specific contractual obligations on our clients to take all necessary action to safeguard against exploitation and human trafficking within their business activities and supply chain and, where applicable, to comply with the Modern Slavery Act 2015.

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

We understand that the placement and payroll management of temporary workers and contractors gives rise to the highest modern slavery risks in our business operations.

As part of our initiative to identify and mitigate risk we operate an approved supplier list of payroll management companies on which we conduct thorough due diligence prior to commencing a contractual arrangement, and annual audits to ensure continued compliance. This approved supplier list was reviewed and updated during the year to 31 December 2022, which included detailed due diligence on the policies and procedures our approved umbrella suppliers have in place to safeguard against exploitation and human trafficking within their business activities and supply chain. All approved suppliers entered into new framework agreements which included specific contractual obligations to take all necessary action to safeguard against exploitation and human trafficking within their business activities and supply chain and, where applicable, to comply with the Modern Slavery Act 2015.

We also conduct compliance checks on prospective workers prior to placing them to work with our clients. These checks ensure that the contractors we are dealing with are acting voluntarily and have access to their own pay. During their assignments, our contractors maintain regular contact with our consultants, providing a continuous feedback loop for any concerns and to ensure the contractor continues to operate safely.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all employees are required to undertake mandatory modern slavery training on an annual basis.

## **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:

- records of mandatory Modern Slavery training to ensure all employees are aware of the warning signs and know how to report concerns;
- record of reports made under the Policy or the Whistleblowing Policy;
- due diligence screening of payroll management service providers; and
- monitoring of our engagement with clients, suppliers, contractors and employees.

## **Further steps**

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

- continually monitor, clarify and enhance our processes for engaging with clients, umbrellas, payroll management companies and contractors, including the centralising of contractor onboarding across Kernel to ensure consistency in approach;
- auditing our approved umbrella providers to ensure continued compliance;
- implementing additional compliance checks that highlights Modern Slavery Issues via a third-party screening solution to check new clients and high-risk suppliers.
- continuing to provide new suppliers our recently updated Supplier Code of Conduct during the supplier onboarding and management process to enable all suppliers to support our business in combatting modern slavery;
- continuing to raise internal awareness of our Whistleblowing Policy;
- continuing to invest in our CRM and contractor onboarding systems to improve monitoring and reporting capability; and
- continuing to invest in our compliance function to improve monitoring and developing compliance framework.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Kernel's slavery and human trafficking statement for the financial year ending 31 December 2022. It was approved by the Board on 30<sup>th</sup> March 2023.

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Logan Naidu, Chief Executive Officer, Kernel  
Date: 30<sup>th</sup> March 2023