Modern Slavery & Human Trafficking Policy

1. Structure, business and supply chain

KaydeeSayfa Limited, (the 'Organisation') reg. no. 08509810, is headquartered in Shepshed, Leics. UK and sells its products throughout the United Kingdom. Our product range makes use of the highest quality materials, which for the most part is sourced from Europe & the UK respectively. This allows us to focus our oversight and influence over two discrete geographic regions. We have over 20 employees within our organisation in addition to approximately 1,000 workers who are engaged through our supply chain. Where possible, we engage suppliers who have relationships with existing suppliers so that we can contain our supplier network and improve consistency in ethical practices throughout the supply chain.

Building on our existing Environmental Policy and our commitment to the Ethical Trading Initiative and in accordance with the Modern Slavery Act 2015, we have embraced the requirement to provide an annual slavery and human trafficking statement. This will allow us to share our efforts against slavery and human trafficking and improve and measure our success each financial year. This past financial year ending 31 December 2022, we took the following key steps to ensure slavery and human trafficking did not occur within our organisation or supply chain.

2. Slavery and human trafficking policies

Notably, we developed this Modern Slavery Policy. We have clear objectives relating to the following themes:

- Relationships: Strengthening our supplier engagement process
 Feedback: Establishing grievance mechanisms and channels for individual worker feedback.
- Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability.
- Measurable change: Developing verifiable KPIs to measure progress
 Supplier collaboration: Encouraging suppliers to collaborate to address slavery and human trafficking issues.
- Incentivisation: Developing mechanisms to incentivise employees and suppliers to address slavery and human trafficking and improve labour standards.
- Accountability: Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking.

3. Due diligence procedures

We understand that our biggest exposure to Modern Slavery is in our product supply

chains, where we have undertaken activity over the last decade to minimise the risk of Modern Slavery. Within these areas, new suppliers and factories/sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and factories/sites. These audits assess compliance with the Global Sourcing Principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

4. Identifying, assessing and managing risk

We set out to identify the extent of any slavery and human trafficking in our supply chains by:

Conducting internal spot-checks at factories in Europe and the UK. ●
 Questioning 20 workers to discuss their conditions and their rights ● Instituting an annual review questionnaire for existing suppliers to understand suppliers' self-assessment of slavery and human trafficking issues, allowing us to better identify slavery and human trafficking issues as they develop over time and to collect supplier-provided data to track improvement in suppliers' attitudes.

5. Key performance indicators

In order to assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

- Staff training levels
- Number of slavery incidents reported in the supply chain

About this statement

This statement is reviewed annually and amended to allow for any changes or improvements deemed necessary by the Directors.

Name: Roy South Date: 01/01/24

Signed: Review Date: 01/01/25