



We Are Kin (Student) Limited

ANTI-SLAVERY POLICY

Version	Date	Description	Responsible	Approved by	Next review
2	September 2022	Adoption of AS policy	Co-CEOs	Board of We Are Kin (Students) Limited	September 2023

2015 Modern Slavery Act

Background:

With effect from 29 October 2015, businesses with a commercial presence in the UK and a worldwide turnover in excess of £36 million now have to report annually on the steps they have taken to ensure that their businesses and supply chains are free of slavery and human trafficking.

Companies that make positive statements regarding the steps they have taken to ensure that their supply chains are slavery-free will need to undertake thorough due diligence before reporting. A statement that no such steps have been taken may attract negative publicity, and companies should be prepared to explain why they considered it unnecessary to take any steps.

The statement should include details of:

1. the organisation's structure, business and supply chains,
2. any corporate policies relating to slavery and human trafficking,
3. key risk areas for the organisation, how risks are identified and how they are addressed,
4. any due diligence or steps taken to prevent human trafficking in its business and supply chains,
5. an opinion on the effectiveness of those steps, measured against performance indicators, and
6. any anti-slavery and human trafficking training available to staff.

WAKS Structure, Business and Supply Chains

WAK considers the risk of abuse of the Modern Slavery Act by its UK based business to be minimal due to the nature of the services being provided. Therefore it has identified its key risks as being:

1. Suppliers providing imported manufactured products, such as for refurbishing/developing assets
2. Construction Contractors and their employment of casual labour

Due Diligence

Anti-Slavery Policies requested from Key Suppliers Any areas of risk are followed up directly by a member of the WAK Team and the client contact at the supplier.