K2 Group
Modern Slavery Statement

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that K2 Partnering Solutions Holding Co Ltd and its affiliates (together "K2") have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. K2 has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

The K2 Group is a group of consultative technology staffing companies and IT services providers operating across the globe. We are headquartered in London, UK, but have operations and subsidiaries in Germany, Switzerland, Spain, Russia, USA, Mexico, Brazil, Australia, Japan, China and Singapore. We source and supply IT professionals for fixed terms and permanent positions, or provide IT services through subcontracted IT specialists to our clients on either a contractual or permanent level. In addition we have a business branch whereby we are official reseller for cloud services of some of our clients (K2 University). We have around 300 employees worldwide.

K2's supply chain is limited in scope. We engage with IT specialists or limited companies for their services. Apart from this we engage with businesses on a local level such as cleaning services providers, office maintenance suppliers, catering suppliers, telephone and internet suppliers etc.

K2 does not produce, manufacture or retail products.

Our high risk areas

K2's usual business operations (engagement of IT professionals) do not normally operate in industries prone to the risks of slavery or human trafficking due to salaries and rates in this area traditionally being above average. Nonetheless, we are committed to preventing any form of human trafficking and slavery and for this purpose, operate a number of policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced

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to work against their will.

2. Code of business conduct and Anti-Slavery policy. These codes explain the manner in which we behave as an organisation, the organisation's stance on modern slavery and explain how employees can identify any instances of this and how our employees can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Supplier Code of Conduct. This code explains the manner in which we expect our suppliers, including our IT contractors, to behave and which contains obligations of adhering to obligations under the Modern Slavery Act 2015.
4. Contractor on-boarding. Reasonable compliance checks are carried out in regard to our contractors and we seek contractual assurances that employment, immigration, minimum wage and health and safety laws are adhered to.

We conduct training for our employees so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval of this statement

This statement was made for K2 Partnering Solutions Holding Co Ltd and all its affiliates for 2022 financial year. It shall equally apply to any future financial years unless amended.

This statement was approved by Executive Board on the 1st October 2022.



Antonio Gulino
Chief Executive Officer

1st October 2022

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