



# Modern Slavery Policy

## 1 Purpose and Scope

This policy outlines the principles and actions KeepCup undertakes to ensure modern slavery risks are understood across the business and practices are in place to address occurrences if they arise. This policy has been informed by the [Ethical Trading Initiatives Modern Slavery Statement Framework](#), the United Kingdom’s Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. There is no globally agreed definition of “modern slavery,” but the term describes various practices that seriously exploit people for personal or commercial gain, including:

- **Human trafficking:** exploitation of people through forced prostitution, labour, marriage, criminal activities, or organ removal. Often threats of violence or coercion are used to harbour or recruit victims of human trafficking.
- **Slavery:** where someone exercises powers attaching to the right of ownership over another person, including the power to make the victim an object of purchase.
- **Servitude:** where a person provides labour or services and, because of the use of coercion, threat, or deception, that person does not consider themselves free to cease providing the labour or services or to leave the area where they provide that labour or services, and they are significantly deprived of personal freedom.
- **Forced labour:** work performed, or services provided against someone’s will and/or under threat of punishment to themselves or their family.
- **Debt bondage:** work performed, or services provided to pay off a debt with no control over how the debt is paid off or employment conditions.
- **Forced marriage:** marriage against someone’s will and with no option to leave that marriage. Often will include unpaid domestic labour as part of the forced marriage.
- **Child labour:** where a child under 18 years is exploited for labour. Child labour is related to work that deprives children of their childhood and dignity and is mentally, physically, or morally dangerous to children.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of everyone across our business. We are committed to avoiding any activity that might lead to or suggest a breach of this Policy.

Who	Where
This policy applies to all employees, interns, agents, contractors, external consultants, third-party representatives and suppliers.	All hubs

## 2 Key roles and their responsibilities

Role	Responsibility
Innovation Manager	Overseeing implementation of the requirements of this policy and reviewing this policy at least every two years
People and Culture Manager	Supporting implementation of the requirements of this policy, including ensuring that appropriate training is provided to all employees.
Senior leadership team (SLT)	Understand leadership responsibilities in ensuring this policy is strictly adhered to
All employees, suppliers and contractors	All employees are responsible for understanding the nature and signs of modern slavery, for risk management in their respective business areas and for raising any concerns.

## 3 Requirements

### 3.1 Principles

KeepCup has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operations and supply chain. We always seek to understand and mitigate all potential modern slavery risks related to our business and to implement steps to prevent slavery and human trafficking.

Modern slavery exploitive practices seriously violate an individual's human rights and dignity. Whilst it does not include practices like substandard working conditions or underpayment of workers, these practices are also illegal and harmful and may be indicators of modern slavery.

### 3.2 Awareness, Reporting and Management Response

All our employees are responsible for understanding the nature and risks of modern slavery and reporting any concerns through the reporting channels outlined below.

While modern slavery is more prevalent in certain countries and across specific industries, it can occur in every country and industry. It is essential to understand that there is no typical victim, and some victims do not understand that they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim, namely, the person:

- Does not have their passport, identification, or travel documents.
- is acting as though they are being instructed or coached by someone else.
- allows others to speak for them when spoken to directly.
- is dropped off and collected from work.
- is withdrawn, or they appear frightened.
- does not seem able to contact friends or family freely, or
- has limited social interaction or contact with people outside their immediate environment.

This list is not definitive nor exhaustive, and it contains examples only. A person may display several of the trafficking indicators above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is incorrect.

All employees are encouraged to look for ways to reduce the risk of modern slavery in our business and to provide any suggestions to improve this policy directly to the KeepCup Innovation Manager.

If anyone has a suspicion of modern slavery in any part of our business or supply chains these should be raised as soon as possible, confidentially with your supervisor, People & Culture Manager, or Innovation Manager. KeepCup encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they are mistaken. We are committed to ensuring no one suffers any detrimental treatment due to reporting under this Policy.

Management at all levels will:

- listen and be approachable to others within KeepCup's business.
- respond appropriately if they are told something that might indicate an exploitative situation.
- remain alert to indicators of modern slavery
- use their experience and professional judgment to gauge situations, and
- ensure that those reporting to them understand and comply with this Policy.

KeepCup's Whistle-blower Policy may also be followed to raise these concerns anonymously through a third party.

All concerns raised will be assessed by the Innovation Manager and they will appropriately investigate and address the situation while preserving affected individuals' anonymity and privacy.

### 3.3 Management of Risks in our Company Structure and Supply Chain

#### Governance

KeepCup conducts sales and operations in two locations. Company headquarters are in Clifton Hill, Melbourne, Australia, with a subsidiary hub in Leyton, London, United Kingdom.

KeepCup is certified BCorp and a business run following the ethical principles outlined in our Code of Conduct, which outlines the ethical behaviours expected of our staff and directions that underpin all that we do. In addition, KeepCup has a formal Whistle-blower Policy, Sustainability Policy, Purchasing Policy, Risk Management Policy, and Supplier Code of Conduct. This framework outlines our requirements and expectations for managing modern-day slavery risk areas across our operations and supply chain.

#### Our Workforce

KeepCup recognises our responsibility to ensure that our people work in a safe environment, free from harm, and are paid fairly for their work. KeepCup products are hand-assembled by our warehouse teams in the UK and Australia. We occasionally use an agency in the UK and engage casual and zero-hours employees as required in both hubs. We are a London Living Wage certified employer in the United Kingdom and pay above-award wages in Australia.

## Our Supply Chain and risk identification

KeepCup recognises the risks of modern slavery and is committed to improving systems and processes to avoid complicity in modern slavery violations. We work to create a responsible supply chain and drive positive social and environmental impact upstream and down. Close, transparent, and long-term direct supplier relationships are at the heart of how we do business.

Where possible, we utilise local manufacturing for product components. This means we invest in the community in which we operate whilst reducing the environmental cost of logistics. Having local manufacturers whom we can visit regularly and often have weekly or daily contact with is crucial in reducing the risks of modern slavery within our supply chain.

All suppliers must commit to the [KeepCup Supplier Code of Conduct](#), which adheres to the Ethical Trading Initiative (ETI) Base Code and the International Labour Organisation's (ILO) Fundamental Principles and Rights at Work. The code requires all suppliers to attest that:

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- Child labour will not be used.
- Living wages are paid.
- Working hours are not excessive.
- Discrimination is not practised.
- Pregnant and breastfeeding employees are supported.
- Regular employment is provided.
- There will be no harsh or inhumane treatment.
- Corruption and bribery will not be practised.

All plastic components and all packaging are locally manufactured relative to each hub. KeepCup components not manufactured in one of our local hub countries cannot be sourced there and are sourced from Portugal and China. For all international sourcing, where we cannot visit our suppliers as regularly, we ensure strict adherence to the KeepCup Supplier Code of Conduct, and we utilise third-party audit platform [Sedex](#) to identify and mitigate ethical and labour risks. Suppliers re-commit to the Code of Conduct annually and are reviewed annually via the KeepCup Supplier Assessment Questionnaire and associated third-party audits.

Before engaging suppliers, we conduct appropriate due diligence with a robust onboarding process that establishes how suppliers identify, prevent, mitigate, and address actual and potential adverse human rights impacts in their operations and supply chains, including modern slavery. This includes auditing the suppliers' certifications, ethical standards, labour relations, health & safety standards, and employee contracts.

## 3.5 Remediation

If KeepCup identifies that it has caused or contributed to an instance of modern slavery, KeepCup will adopt measures to try to 'make good' all adverse impacts. The Innovation Manager takes the lead if a case is discovered within KeepCup's supply chain and will work with relevant suppliers and employees to provide remediation solutions. KeepCup will utilise the resources on [stronger2gether's](#) website, which outlines the immediate actions to take in the discovery of such instances, the reporting and evidence collection procedures required, the strategies for remediation of the situation and the ongoing protection and support of the individual or individuals affected, and continued monitoring to safeguard against recurrence.