

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps that KYTE POWERTECH Ireland Limited have taken during the previous financial year to ensure that slavery and human trafficking is not operating within its own business or supply chains.

## **Company Overview**

Kyte Powertech Ireland Limited manufactures single phase and three phase distribution transformers. Kyte Powertech Limited is a wholly Irish owned company serving and international client base.

Kyte Powertech design, manufacture, assemble and test transformers on-site with its >400 strong workforce of many nationalities and diverse backgrounds. Suppliers to Kyte traverse the globe. Having many local Irish and UK suppliers, the immediate chain also reaches as far as Eastern Europe, India, China and Taiwan.

## **Philosophy and Principals**

Kyte in all its dealings within its employment activities and supply chain, aim to adhere to the highest ethical standards and in improving these standards on an ongoing basis. As part of this, Kyte Powertech Limited have committed to an increased focus on the requirement to eradicate modern slavery and human trafficking from any aspect of its business or supply chain.

## **Employment Practices at Kyte Powertech Limited**

Kyte Powertech has examined its own labour practices and will audit the supply chain with the principals below in mind.

- All employment contracts are entered into on a voluntary basis and workers have the freedom to terminate their employment at any time without penalty given, with notice of reasonable length and communicated at time of contract signature. No form of forced, compulsory, bonded, indentured or prison labour should be used.
- Employees and contracted workers are not charged any fees or costs for recruitment, directly or indirectly, including costs associated with travel, processing official documents or work visas.
- Identity documents are requested during recruitment of employees both as confirmation they are who they say they are, and to ensure they have access to these documents. No identity document are confiscated or withheld.

- Contracts of employment are provided in a language the employee understand or translated for them to ensure full understanding. All contracts issued comply with the Terms of Employment (Information) Acts 1994-2014 (for Ireland).
- Deposits or security payments are not and should not be required for securing employment.
- The workplace is free from harsh or inhumane treatment with clear and communicated fair disciplinary policies and procedures, grievance procedures in line with natural justice.
- Clear, communicated, and effective procedures exist to prevent and investigate any practice of coercion, corporal punishment, bullying, harassment, violence, or intimidation.
- A workplace equality policy is clearly available and upheld ensuring all workers shall be treated fairly and equally, with no less favorable treatment to non-nationals.
- Minimum wage is paid where required by law, and in all employment, cases exceeded, wages are paid regularly and directly to the worker and in accordance with national law. Wages are not unnecessarily delayed, deferred or withheld.
- Working hours are in line with national legislation not exceeding an average of 48/week. Where no legislation exists working days and weeks should not be excessive e.g., exceeding 60 hours per week. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas.
- Workers movements are not unreasonably restricted or confined to the workplace or premises. Workers have freedom of movement and personal freedom outside working hours.
- Any agency migrant workers should be certified certified or licensed by a competent authority, and not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for exploitation.

## **Supplier Due Diligence**

Our procurement process currently covers self-audit/audit and verification of Social Responsibility.

All our suppliers are expected to comply with all laws and regulations. We request information/evidence concerning, amongst other things health and safety, environmental, quality, and fair treatment of people. We revert to the supplier in the event of ambiguity or non-compliance. New suppliers are evaluated with regards to Supplier Ethics and Sustainability.

## **Improvement and Monitoring**

In line with the requirements of the Modern Slavery Act 2015 Kyte Powertech Limited continue to review its supply chain procedures with a view to introducing more specific and measured ways to ensure that human rights are not abused by offences of slavery, servitude and forced or compulsory labour or human trafficking.

Kyte Powertech Limited has:

- Have proposed an effective, meaningful, and relevant policy for the organisation to the board.
- Identified relevant personnel for training and completed such training.
- Implemented procedures to effectively risk assess its supply chain.
- Audited suppliers with respect to Modern Slavery and Human Trafficking
- Encouraged and shared with the greater Kyte organisation to become more efficient and effective regarding the prevention of Slavery and Human Trafficking.
- Laid out procedures/contractual obligations for when violations of human rights have been found or for when further investigation is necessary.

Kyte has distributed its Supplier Ethics Questionnaire to new suppliers and has included a number of slavery indicators in its audit processes. A risk assessment system has identified which suppliers to require priority.

A handwritten signature in black ink, appearing to read 'Stephanie Kearney'.

CEO Kyte Powertech Limited on behalf of the Board

Date: 29<sup>th</sup> August 2022