



## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

### Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At BW4-UKagNag Sweden Private Limited, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business & corporate partners, and to implement steps to prevent slavery and human trafficking during the three years 2023-2026.

### Organisational structure

- BW4-UKagNag Sweden Private Limited has business operations in Sweden.
- We have corporate business partners in the taxi & transport, retail-stores and restaurants, accounting, corporate finance, entrepreneurial and business advisory sectors.

We work with several key corporate partners who provide us primarily with business services, including assistance in law matters by Law firm in Gothenburg, Auditing by Authorised Auditor Falköping, IT software, marketing and consultancy.

We establish a relationship of trust and integrity with all our corporate customers, which is built upon mutually beneficial factors. Our corporate customers selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our corporate customers, but if we were, then we would act immediately against the supplier and report it to the authorities.

### Risk assessment



In the past year, we conducted a risk assessment of our client by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the customers.
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.





## Policies

BW4-UKagNag Sweden Private Limited operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Recruitment and Selection Policy** – We conduct checks on all employer and prospective employees to verify that they are eligible to work in the Sweden according to Swedish Immigration law.
- **Supplier Code of Conduct** – We operate this policy to ensure our Corporate Customers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.
- **Whistleblowing Policy** - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- **Staff Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our services.
- **Purchasing Code** - we have updated our Purchasing Code and customer contracts to make explicit reference to slavery and human trafficking.
- **Safeguarding Policy** – This policy highlights the potential risks of modern slavery and human trafficking, including how to identify signs of exploitation and how to report concerns.

## New Corporate due diligence

KagNag Sweden AB Private Limited conducts due diligence on all new corporate customers during on-boarding and on existing customers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the customers data, and their employee's health and safety standards, labour relations and employee contracts and labour laws.
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements.

We require all Corporate Customers to attest that:

- They don't use any form of forced, compulsory or slave labour.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment.
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons.
- They don't require employees to surrender their passports or work permits as a condition of employment

## **Awareness**

KagNag Sweden Private Limited has raised awareness of modern slavery issues by sending an email that is focused specifically on modern slavery to all our staff, which explains time to time on media and on migration board website.

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

## **Training**

In addition to the awareness programme, Bw4-UKagNag Sweden Private Limited has rolled out a fresh e-learning course to all corporate customers contacts, which covers:

- Various forms of modern slavery in which people can be held and exploited.
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery?
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls.

## **Measuring how we're performing.**

KagNag Sweden Private Limited has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and consult work. These include:

- How many corporate customers have filled out our ethics questionnaire and signature our routines for terrorism, money laundering and human trafficking?
- How many corporate customers have rolled out an awareness and training programme that is equivalent to ours? How many customers have listened to Swedish Business Union (Svenska Näringsliv). seminars about to save your business from crimes?
- How many reports have been made by our staff that indicate their awareness of and sensitivity to ethical issues?

In the next three years, we intend to take the following steps to tackle slavery and human trafficking by introducing new policies and procedures and/or organising wider training for the internal team working on modern slavery and human trafficking issues.

- 1- Regularly post videos and interviews from migration board on our website for modern slavery.
- 2- Invite the corporate customers to different online seminars arranged by tax authorities & Swedish Corporate Union.
- 3- Follow up all clients and helping them to update control pay role of employees according to Swedish corporate law.
- 4- Follow up and lead our corporate customers to pay relative insurance, pensions and strictly focus on working environment law on workplace.
- 5- Categorised corporate customers into different levels accordingly to the financial rappsorts, annual rappsorts, and numbers of employees to comate human trafficking, slavery, money laundering and terror finance.
- 6- A three-year comprehensive rappsort will be published for our own internal data for the purpose of training and increase of knowledge.

This statement covers 1 April 2023 to 31 March 2026 and has been approved by the board of board of directors at the board meeting on 13/04/2022.

Ali Liaqat  
