

# Modern Slavery Statement

Although CKBR falls below the £36 million mandatory reporting threshold of the UK Modern Slavery Act 2015, this statement serves as a high-assurance disclosure for our UK clients who must manage their own supply chain risks.

## 1. Purpose: Our Commitment to Ethical Trade

The company maintains a **zero-tolerance** approach to modern slavery and human trafficking in all forms. As a specialised UK consultancy business, our mission is to provide the "eyes and ears" for UK importers, ensuring that transparency and human rights remain at the forefront of the China-UK trade corridor. We are committed to acting ethically and with integrity in all our business dealings and to implementing systems that prevent modern slavery from taking place within the supply chains we audit.

## 2. The Auditor's Role

The company's primary value lies in our physical, on-site presence in the Chinese manufacturing sector. Unlike desk-based due diligence, our Tier 2 (Physical) Factory Audits are specifically designed to identify high-risk indicators of forced labor as defined by the International Labour Organization (ILO):

- **Restricted Movement:** Verifying that workers are free to leave the premises and that dormitories are not inappropriately secured.
- **Withholding of Documents:** Confirming that suppliers do not retain original identity documents (passports/ID cards) of their workforce.
- **Debt Bondage:** Investigating any "recruitment fees" or wage deductions that may trap workers in a cycle of debt.
- **Excessive Overtime:** Monitoring working hours to ensure they align with local labor laws and international safety standards.
- **Abusive Working Conditions:** Assessing the physical environment, including the quality of on-site living quarters and sanitation.

### 3. Due Diligence & Risk Mitigation

Our due diligence process is a multi-layered approach to risk identification:

- **Physical Inspections:** Conducting unannounced or scheduled site visits to verify "Verified Data" against "Third-Party Data" provided by factory management.
- **Regional Risk Mapping:** Providing practical advice to clients regarding high-risk geographical regions or industrial sectors within China where labor exploitation is statistically more prevalent.
- **Closed-Loop Reporting:** Utilizing our secure "Stealth VPN" and "Thin Client" protocols to ensure that sensitive findings regarding labor practices are transmitted directly to the UK client without local interference.

### 4. Training & Specialist Awareness

As a specialist operative, the company maintains up-to-date knowledge of the evolving landscape of forced labor indicators specific to the PRC. This includes:

- **Continuous monitoring** of international sanctions and human rights reports.
- **Annual training** on identifying subtle indicators of coercion or deceptive recruitment.

### 5. Reporting Non-Compliance

If evidence of modern slavery or significant human rights violations is uncovered during an audit, the company follows a strict protocol:

- **Immediate Notification:** The UK client is alerted within 24 hours of the finding via secure channels.
- **Recommendation for Disengagement:** We provide a formal recommendation for immediate or phased disengagement from the supplier, depending on the severity and nature of the risk.
- **Remediation Guidance:** Where possible, we advise on whether the issue is systemic or correctable through rigorous remediation plans.

Upon the discovery of labor violations, our primary objective is the protection of affected individuals. While we may recommend immediate disengagement for severe or systemic abuses, we also provide clients with structured remediation guidance. This approach aims to determine if an issue is correctable through rigorous, monitored improvement plans that prioritize the welfare of the workforce over immediate contract termination.

## 6. Accountability

This statement has been voluntarily approved by the leadership of the company and will be reviewed annually to ensure it reflects the latest legal requirements and operational realities of the 2026 trade environment.

---

## Version History

Version	Date	Description of Changes
v1.0	01/03/2026	Initial Release
v1.1	06/03/2026	Updated Section 5

**Next Expected Review : March 2027**