



# KINGS OF TRANSLATION

## MODERN SLAVERY POLICY

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# 1. Purpose of This Document

This Modern Slavery Policy sets out a framework that ensures that all of Kings of Translation's activities are both ethically and legally secure and private. It considers the impacts of Kings of Translation's business activities on the security of our clients' customers', contractors' and freelancers' data.

Kings of Translation Ltd whose principal activities are multi language translations are committed to ensuring that any business undertakings are conducted as securely and ethically as possible by following the below policy.

## 2. Users

This policy document shall be made available to Kings of Translation's management, employees, and freelancers as well as shared with past, present and prospective clients and other persons upon request.

## 3. Overall Statement

Kings of Translations believes that all of our employees, contractors freelancers and clients should ensure that all of their work in undertaken in an ethical manner. Kings of Translations are aware that, as many of our staff members are freelance and working remotely and we encourage all staff to be aware of our Modern Slavery Policy. We also ensure that they are paid an ethical rate of pay, appropriate to the market rate of the work that they undertake.

Wherever possible, **risks should be eliminated** by the careful selection and purchase of facilities, equipment and processes, or **minimised** by the use of physical control measures. Where this is not possible, systems of work will be used to control risks to an acceptable standard to all interested parties.

At all times Kings of Translations will pursue a progressive and continual improvement in its security and privacy policies. To sum up **"we will attempt to always do good for our stakeholders, the environment and our business."**

As our primary role is multi language translations, most of our employees are remote and all of our employees extensively use computing equipment in their day to day employment. This P & S Policy reflects this fact.

## 4. Modern Slavery Statement

In our business modern slavery can be such matters as enforced labour, encouraging people to commit crimes – even sometimes those thought as less harmless such as tax fraud – and employing people at rates that are far less than market rates.

Kings of Translation is committed to ensure that there in no modern slavery, human trafficking, coercion of individual to commit crimes or below market rate payments within our supply chain. This includes the freelancers we employ.



Our anti-slavery working methods reflect our commitment to acting both ethically and with total integrity in all of business working relationships, our relationships with our translators and lastly our supply chain. We implement and enforce working methods and procedures that ensure that our business environment is free of all opportunities to involve modern slavery.

These business methods include reviewing any suppliers and asking them to complete a modern slavery statement. Our freelancers and contractors are paid at or above market rates and treated with dignity and respect. All of our deadlines are reasonable and achievable by a translator with the required skill base.

We also have in place processes to protect any whistle blowers, and we will treat these with security, dignity and respect, listening to their concerns and acting upon any possible modern slavery issues.

## 5. Supply Chain

We ensure that all members of our supply chain come from areas where there is a minimal chance of modern slavery. We also request all suppliers to provide us with a Modern Slavery Statement of compliance with the Modern Slavery Act 2015.

All products purchased comply with the laws regarding slavery and human trafficking in the country or countries of origin and The Modern Slavery Act 2015.

## 6. Our Translators

As multi language translators, we use translators from many different countries, some from third world countries or areas where Modern Slavery may happen. We always communicate with the freelancer directly and have standard questions to ensure they are working at their own volition. We pay at or above market rates for translators regardless of their country of origin.

All freelance staff are responsible for their own taxation affairs within their own country and we notify them of this matter.

## 7. Our Business Operations

We are currently free of all modern slavery issues and regularly conduct independent, unannounced audits of our operations and suppliers in respect of risks of the occurrence of slavery and/or human trafficking. Should there be a non compliance we will remove that supplier or freelance translator.



## 8. Responsibilities for Modern Slavery Policy

Data security is the responsibility of management, to ensure that everything practicable is done to ensure data security in the process of production, design on and operation of equipment, and to maintain a safe and healthy place of work. However, each employee, contractor and freelancer has their own personal responsibility to ensure that they work responsibly and keep data secure

Title	Responsibility	Person responsible
Director	<p>The overall and final responsibility for this policy and all purchasing and working methods.</p> <p>The day to day for ensuring this policy is put into practice</p>	

## 9. Employee Responsibilities

All employees, contractors and freelancers have a responsibility to actively ensure that they work responsibly with their actions or inactions.

All Kings of Translation's employees and contractors should:

- Co-operate with supervisors and managers on Modern Slavery matters;
- Ensure that their own working environment is safe, secure and environmentally responsible.
- Report all data security concerns to an appropriate person.

## 10. Terms Used

**Head Office** – our own premises – Holden House.

**Freelancer** – our translators who work in their own premises, on a freelance basis, on a per project basis.

**Contractor** – staff who work either in their own premises or at our office on a per term basis.

**Staff** – a salaried member of staff

## 11. Contact

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