
COMPANY POLICY

Modern Slavery Statement

Policy owner	Kevin Buchler, Founder & Managing Director, CoolPath Ltd
Applies to	CoolPath Ltd and its network of training, college and technician partners
Effective date	August 2026
Next review	August 2027, or sooner following a material change in law, scale or activity

1. Introduction

The Modern Slavery Act 2015 requires commercial organisations with a turnover of £36 million or more to publish an annual slavery and human trafficking statement. CoolPath's turnover is currently below that threshold and it is not legally required to publish this statement. It chooses to do so voluntarily, given the nature of its activity: recruiting and facilitating funded training routes for young people and adults, including candidates referred through Jobcentre Plus and Sector-based Work Academy Programmes, some of whom may be in vulnerable circumstances.

2. Organisation and Supply Chains

CoolPath is a network facilitator and Registry operator, not a manufacturer or employer of installation labour. It does not hold a hardware supply chain in the conventional sense. Its principal relationships are with training providers and colleges delivering funded accreditation, and with network technician partner organisations that host placements and deploy Registry-listed technicians.

3. Policies and Due Diligence

- Recruitment integrity: every candidate is recruited directly or through a recognised route (school, college, Jobcentre Plus, SWAP), with identity and right-to-work checks completed before a funded place is confirmed.
- Basic due diligence is carried out on new network partners before onboarding, including confirmation of legitimate trading status.
- Staff and mentors are made aware of the indicators of labour exploitation, reflecting the recruitment-adjacent nature of CoolPath's model.
- This policy operates alongside CoolPath's Safeguarding Policy and its confidential whistleblowing route.

4. Approval

This statement is reviewed and approved annually by the Founder & Managing Director.

Approved and signed on behalf of CoolPath Ltd:



Kevin Buchler

Founder & Managing Director, CoolPath Ltd

Date: August 2026