



JPR SERVICES (WELWYN) LIMITED

MODERN SLAVERY ACT POLICY

Purpose

We are committed to ensuring that all of our employees and representatives are free from involvement with slavery or human trafficking. This policy is designed to promote ethical business practices and policies to protect workers from being abused and/or exploited whilst employed, or providing goods and services in our business and that of our supply chains.

This policy is designed to ensure that we comply with Section 54 of the Modern Slavery Act 2015 and sets out responsibilities for our employees, promoting transparency to ensure that the public, consumers, employees and suppliers know what steps we will take to tackle any issues associated with this policy and provide a method by which legitimate concerns or worries can be raised.

Our ethos is that by fostering a culture that rewards identification of risks and through our actions and commitment to Anti-Slavery & Human Trafficking, we will be better able to discover it, ensure appropriate remedies are put in place and to prevent it from occurring in the future.

This policy is applicable to all employees working on our behalf, in any capacity including those on a permanent and fixed-term basis, at any level, directors, officers, temporary or agency staff, volunteers and interns. A copy will be made available to agents, Contractors, Sub-contractors, Suppliers, third-party representatives or business partners who work for, with, or on behalf of us.

Slavery and Human Trafficking

Slavery and Human Trafficking is a crime and a violation of fundamental human rights and this term covers two offences; Modern Slavery Act covering: slavery, servitude and forced or compulsory labour and human trafficking, as set out in Section 1 and 2 of the Act.

Slavery and Servitude is where an individual exercises the right of power or ownership over another, as 'ownership' of a person is not possible, slavery is deemed to be the 'offenders' behaviour as it deprives the 'victim' of their freedom. Servitude is where an individual is coerced, or where there is an obligation to provide services that are imposed.

Forced or Compulsory Labour involves coercion and direct or indirect threats of violence to an individual who has not offered themselves voluntarily to provide work or services and are under the threat of a 'penalty' if they do not comply.

Human Trafficking is where an individual arranges or facilitates the travel of another person (even if the person agrees to the travel and/or agreement), with a promise e.g. of a better life



or job and the individual is deceived, thereby deemed to have been exploited (sexually or otherwise) e.g. poor or unsafe working conditions, long hours, low pay.

All of these are examples of a person's liberty being deprived by another in order to exploit them for personal or commercial gain.

We have a zero tolerance to Slavery and Human Trafficking and respect human rights, including children's rights and commit to: -

- Acting ethically and with integrity in all of our business dealings and relationships.
- Implementing and enforcing effective systems and controls to ensure Slavery and Human Trafficking is not taking place anywhere in our business or that of our supply chain(s).

We are committed to ensuring there is transparency in our own business and in our approach to tackling Slavery and Human Trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our customers, suppliers and any other business relationships.

Our commitment to tackling Slavery and Human Trafficking not only protects vulnerable workers and helps to prevent such violations but also promotes our: -

- Reputation and brand through our commitment to accountability and transparency.
- Commitment to working with other businesses with equally high ethical standards.
- Moral duties to influence continuous improvements in our supply chains.
- Commitment to our Company values, where everyone is treated with dignity and respect.

Responsibility

Company Directors

Our Company Directors have overall responsibility for ensuring that this Policy complies with our legal and ethical obligations and that it is implemented and regularly monitored.

We will ensure that our zero tolerance to Slavery and Human Trafficking and our expectation for our Suppliers, Contractors, Sub-Contractors and business partners to also operate in accordance with the Act is communicated at the outset of all business relationships, included in our Commercial Agreements and reinforced as necessary thereafter.

We will publish (including on our website) an annual Anti-Slavery and Human Trafficking statement which explains the steps that we have taken to ensure that slavery and trafficking is not taking place in any part of our business and that of our supply chains, the following will be included in the statement: -

- Confirmation of stakeholder engagement.
- Our zero-tolerance approach and policies in relation to Slavery and Human Trafficking and actions taken to embed respect for these.

- Confirmation that training is available to our employees.
- The structure of our organisation, business operations and supply chains.
- Our due diligence process to include details of the risk management process, monitoring and evaluation measures, action plans and how actions have been prioritised.
- Our on-going assessment of the effectiveness of the measures and meeting changing expectations.

This policy will be reviewed annually to coincide with the publication of our Annual Statement or at any other regular interval for example: -

- Where legislation changes or updates necessitate Policy revision.
- Following an internal and/or external audit.
- Following any investigation where measures identify the need to review our processes.
- A review of our internal process identifies process improvements.

Managers and Team Leaders / Supervisors

Our managers and Team Leaders and Supervisors have day-to-day responsibility for ensuring that: -

- Those reporting to them understand and comply with this policy.
- They are given adequate and regular training (including in supply chains) and guidance e.g. the Modern Slavery Helpline (0800 0121 700) providing information and guidance to anyone who thinks they may have come across an instance of modern slavery or be a victim themselves;
- They immediately deal and escalate any queries or concerns.
- All employees are aware of the standards of conduct expected of them.

Employees

Are responsible for: -

- Ensuring they have read, understand and comply with our Policy at all times.
- Ensuring their conduct and/or behaviour complies with company standards and the detail of this Policy.
- Preventing, detecting and reporting any (or possible) acts of slavery and/or human trafficking in any part of our business, or supply chains.

Procedure

If it is believed or suspected that a breach of this policy has occurred, or that it may occur, all employees must notify their Immediate Supervisor immediately.

Employees should refer to our Whistle-blowing Policy for further details. As guidance, Whistleblowing is when an individual provides information (or makes a disclosure) on something that has come to their attention through their work. In most cases the 'whistle-



blower' will not be directly or personally affected by the danger or illegality (although they may be) but is raising concerns as to the affect it may have on others.

We actively encourage open and honest communications; therefore, our Whistle-blowing policy is important in providing guidance and clear steps to follow for anyone wishing to raise an issue in confidence where they genuinely believe, in good faith, that a major wrongdoing or malpractice has (or may) occur.

Appropriate steps will be taken to ensure that the working environment and/or working relationships are not prejudiced by the fact of any disclosure.

It is important to understand that where concerns are raised in good faith and the individual reasonably believes that modern slavery (in whatever form) is, or may be, taking place in any part of our own business, or that of our supply chain, they are protected from possible reprisals or victimisation and there is no adverse repercussions if they have acted in good faith, even if they have been mistaken.

In making a disclosure however, the individual should take care to ensure the accuracy of the information, as this assurance cannot be extended to anyone who it is shown has raised untrue matters. Please note however, that individuals will not be protected from the consequences of making such a disclosure if, by doing so, they commit a criminal offence.

If any disclosure is made in bad faith, mischievously or maliciously (for instance if it relates to a personal grievance, or in order to cause disruption with the Company), or concerns information which they do not substantially believe is true (e.g. rumours), or if the disclosure is made for personal gain, then such a disclosures may constitute a disciplinary offence and result in disciplinary action up to and including dismissal.

If an employee believes they have suffered such treatment they should inform their Immediate Supervisor immediately. If the matter is not resolved to the employee's satisfaction, they should raise this formally using our Company Grievance Procedure.

Where possible and with welfare and safety for all as a priority, we will give support and guidance to our suppliers to support them to address coercive, abusive and exploitative work practices in their own business and supply chains.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain(s) constitutes any of the various forms of modern slavery, they should raise it immediately with their Immediate Supervisor, in accordance with our Whistle-blowing Policy.

Where a specific or serious case is identified in the UK this will be reported immediately to the Police, if a case is identified or suspected abroad, our response will be tailored appropriately by engaging the relevant local Government and/or law enforcement bodies as necessary.