



Modern Slavery and Human Trafficking Policy Statement

Jenner (Contractors) Ltd complies with section 54 of the Modern Slavery Act 2015, and sets out the responsibilities for employers and employees. This applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We have policies in place, prohibiting harassment, discrimination and victimisation which provide our employees with information on rights and how to identify and escalate concerns. We have a zero-tolerance approach to modern slavery in our organisation and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We are committed to:

- ensuring that all of our business operations are free from involvement with slavery or human trafficking,
- operating systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect our suppliers to hold their own suppliers to the same high standards,
- ensuring that all commercial agreements

include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act,

- undertaking due diligence processes to ensure that there is no slavery or human trafficking in our business and supply chains,
- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK,
- carrying out research to identify any parts of our business and supply chains where there is a risk of slavery or human trafficking taking place, and following agreed steps to assess and manage the risk,
- assessing the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, including the way that we assess and manage any risks that are identified,
- ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility,
- ensuring that any concerns about slavery or human trafficking can be raised through our whistle-blowing procedure,
- appointing a named individual to oversee the compliance with the Modern Slavery Act 2015 (this person is our Managing Director),
- providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.



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Using our risk based approach, we assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct,
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code.

As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct. If we find that other individuals or organisations working on our behalf have breached

this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach when terminating such relationships.

Signed:

A handwritten signature in black ink, appearing to read "Martin Sandall".

Martin Sandall
Managing Director (On Behalf of Board of Directors)

April 2020 (Financial YE March 2020)
