



## **JAS Forwarding (UK) Limited Modern Slavery Statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal commercial gain.

Modern slavery remains a hidden yet dangerous problem on our global society. We all have a responsibility to be vigilant in recognising and responding to the risks, however small, in our business and in the wider supply chain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealing and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

### **Our Structure and business**

We are a solution-focused logistics supply chain provider, founded on the principles of professionalism, partnerships and strong systems. We are an asset-light and independent provider of cost-effective, lean and agile solutions, with a global footprint with over 300 JAS offices extending over five regions, covering our core markets worldwide.

Our capabilities include Sea and Air freight forwarding, Warehousing and fulfilment, trucking and supply chain management information systems.

We are very aware of the potential risks of modern slavery, especially in some of the geographies where we operate. No matter how small these risks may be, we are taking active steps to identify and where applicable mitigate them as quickly as possible.

### **Our Policies on Slavery and Human Trafficking**

The Policies we have in place and our anti-slavery statement reflect our commitment to:

- Paying people fairly and properly for their work;
- Acting ethically and with integrity in all our business relationships; and
- Enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

The main policies include:

#### **Fair Pay**

JAS Forwarding UK Limited are 100% committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform.

#### **Employment Awareness and Compliance**

Our staff handbook sets out all of our employment policies and procedures. It includes our expected standard of conduct which incorporates our anti-slavery policy and measures.

Being aware of the contents of our employee handbook is one of our mandatory policies, which we expect all employees to observe; every employee signs a declaration when they join confirming their familiarity with our mandatory requirements.

#### **Recruitment**

Most of JAS's workforce is employed directly on a permanent or fixed term basis. Our recruitment takes place through a combination of direct advertising on our website and industry publications/digital media; using reputable agencies and relying on referrals from employees within our organisation.

The firm only uses specified, reputable employment agencies and has a set of standard terms and conditions of business with each agency. We verify the practices of any new recruitment agency as part of our terms of business with them and before accepting workers from that agency.

All employees who join us are subject to check to ensure they are genuine applicants operating as free agents with the required level of propriety. These include verification of identity, references, evidence of qualifications, criminal and financial checks. For the few roles in our business which are filled by contractors or agency workers, we ensure that similar checks are also undertaken.

### **Suppliers and Partners**

We operate a supplier and partner verification process, where we undertake a number of due diligence checks. For suppliers and partners where there it is deemed to be an additional risk of slavery or human trafficking, supplementary checks are completed.

JAS Forwarding UK Limited and partners are an important part of our success and our culture. We expect them all to conduct their business with the same commitment to ethical business practices as JAS.

### **JAS Forwarding (UK) Limited and partners:**

- Will not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily, under threat of penalty;
- Will ensure that the overall terms of employment are voluntary;
- Will not hold passports of migrant workers;
- Will not pay fees to agents other than reputable temp worker agencies where there is an opportunity for workers to engage in temporary to permanent employment;
- Will comply with the minimum age requirements prescribed by applicable laws unless a specific contract contains stricter age requirements;
- Will compensate it's workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay agreements;
- Will abide by applicable laws concerning the maximum hours of labour – such as the provisions of Working time Directive(s) or other applicable laws; and
- Will keep records of, and be entirely transparent in complying with the above.

### **Our Commitment:**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our groups slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2017. It has been approved by our Board, who will review and update it annually.

### **Steps Taken:**

We have started by sending out a copy of our statement to all existing staff for them to read and for all new Employees this statement will now be included in the company Employment handbook.

- We have set up a UK only section on the JAS Worldwide Intranet site. We will upload a short video clip that demonstrates how this legislation is present in the modern world especially with regard to our business. This video will form part of HR's on boarding checks and will also record who has indeed watched the video. All staff have given until end of Jan 2018 to comply with this request.
- A letter has been drafted and awaits approval from the UK MD prior to the statement being distributed to all JAS UK Suppliers, Contractors and Agencies.

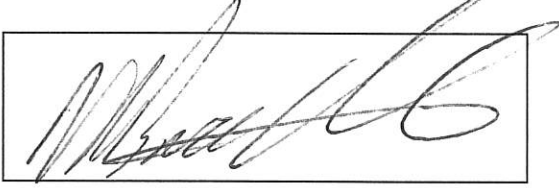
### **Next Steps:**

We are currently reviewing our Supply Chain protocols and will be implementing specific measure to ensure that our obligations under the Modern Slavery Act 2015 are disseminated through our supply chain. These measure will include:

- Continuing to identify and assess any key risk areas in our supply chains
- Contacting all current critical suppliers to affirm our zero tolerance approach to human rights abuses and requesting details of their due diligence procedures both for internal compliance and within their own supply chains.
- Implementing the JAS Forwarding UK Anti-Slavery Policy and providing training for all our managers.

- Including a specific requirement in our procurement vetting process for prospective suppliers to disclose their position on human slavery and trafficking and provide policies/statement as appropriate.

**Signed on behalf of JAS UK Forwarding UK Limited Managing Director:**

A rectangular box containing a handwritten signature in black ink. The signature is cursive and appears to read 'Noel Broadbent'.

**Noel Broadbent**

**Dated: 1<sup>st</sup> January 2018**