



Slavery and Human Trafficking Policy Statement

In accordance with the UK's Modern Slavery Act 2015 and our Partnership with "Stronger Together" J O Sims is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain and our products.

As a member of SEDEX we take our commitment to human rights seriously and take steps to verify, evaluate and address risks at our UK sites and in our supply chain.

J O Sims undergoes annual Ethical (SMETA) Audits using external auditors.

J O Sims recognises that slavery and human trafficking can occur in many forms:

Forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on workers' freedom of movement. As part of the hiring process, workers must be provided with a written employment agreement that contains a description of terms and conditions of employment. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity of immigration documents, such as government issued identification, passports or work permits, unless the holding of work permits is required by law. Workers shall not be required to pay employers or agent's recruitment fees or other aggregate fees in excess of one month's salary. All fees charged to workers must be disclosed.

J O Sims only forms contracts with UK agency labour providers that are GLA registered. The agency labour providers are required to sign service agreements. Labour suppliers are regularly audited by ourselves and checked on the Government Gateway website twice yearly. All interviews are conducted face to face and all staff supplied shall be legally entitled to work in the UK. Evidence of entitlement to work is scanned and verified. J O Sims Labour Providers are in partnership with "Stronger Together"

The focus on slavery and human trafficking is part of a larger effort of supply chain transparency and accountability:

Verification, Audits and Certification of Supply Chain

We view assessments and audits as integral parts of our overall supplier management process. They help us identify compliance gaps where immediate action is needed, and root causes that enable development of systematic solutions and improvements.

Our supplier verification process involves a mix of annual and bi-annual assessments of our major produce and product suppliers. All our major suppliers are required to complete the J O Sims – Socially Responsible Trading Questionnaire. If the site is registered on SEDEX with the Self-Assessment Questionnaire they must provide us with their SEDEX membership number and link to J O Sims Limited. If not, they must complete all sections of the questionnaire covering:

Protection of Children, Health & Safety, Environment, Facilities, Equal opportunities, Freedom of Association, Remuneration and Workers' hours. From here-on-in our Socially Responsible Trading Questionnaire will include a section covering the Prevention of Human Trafficking and Forced Labour.

This questionnaire assists us in determining the risk profile of our suppliers for Health & Safety and Human Rights.

In addition to this self-assessment questionnaire, we will prepare a more detailed survey that covers slavery and human trafficking risks targeted at those companies that we consider higher risk based on their location, the potential for foreign worker exploitation, foreign worker population, or other risk based factors.

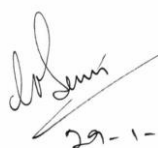
J O Sims creates an annual risk profile of each of our major suppliers based on their supplier self-assessment questionnaires, our knowledge of their operations and practices, and if applicable, the results of targeted surveys.

Suppliers that we identify as higher risk will undergo an audit and/or capability assessment.

The audits are performed using one of two methods: (1) an on-site audit performed by qualified, independent third party auditors or (2) an on-site audit performed by J O Sims auditors. These audits are performed against the ETI base code or a targeted portion of the code based on the suppliers risk profile and our specific compliance concerns. Audits are scheduled with the supplier in advance. We typically do not conduct unannounced audits.

Training

In line with the Home Office guidance, Technical and Field Managers, Ethical Auditors/HR Manager will attend CPD training with the GLA in preparation for auditing/investigating potential Modern Slavery and Human Trafficking. Further and wider training will follow as and when identified.



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