



James Walker Group

**Anti-Slavery and Human Trafficking
Statement**

1 May 2018

1. Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by James Walker Group Limited to prevent modern slavery and human trafficking in its business and supply chains during the year ending 31 March 2018.

2. Our businesses

We have a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains. We published our first statement last year; since then we have continued to increase our work in this area and conducted an audit of the actions taken in our businesses to prevent modern slavery.

3. Policies

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and supply chains. The Anti-Slavery Policy sets out our zero-tolerance approach to modern slavery and human trafficking. Every member of staff is expected to comply with the policy which includes raising any concerns and using the appropriate reporting channels at the earliest possible stage.

The policy is available to staff via our internal intranet systems and on our Group website.

4. Supplier conduct

We have a long-standing approach to supply chain responsibility and so expect our suppliers to agree and adhere to our ethical standards for doing business. These standards require (without limitation) suppliers to:

- refrain from holding a person in slavery or servitude or requiring a person to perform any form of forced or compulsory labour;
- not arrange or facilitate the trafficking of any persons;
- not purchase materials or services from companies who use involuntary labour or participate in human trafficking;
- provide, while taking into account the specific dangers of the relevant sector, for safe, hygienic, and healthy working environments for their employees;
- provide, as a minimum, rates of pay at the national legal standards; and
- act in accordance with applicable national and regional laws and regulations at all times.

5. Training

In order to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide guidance and training to our staff where relevant.

We have also published detailed policy guidance to staff on identifying and responding to an incident of modern slavery. This guidance is available via our internal intranet systems.

6. Due diligence processes

We have in place processes to:

- identify and assess potential risk areas in our supply chains (where appropriate);
- audit existing and prospective suppliers (where appropriate);
- mitigate the risk of slavery and human trafficking occurring in our supply chains
- review and record the implementation annually with subsidiary businesses; and
- protect whistle blowers.

7. Further steps

As an organisation, we are committed to building on what we do each year to prevent modern slavery and human trafficking. Following a review of the effectiveness of the actions we have implemented to date, we intend to take the following further steps to combat modern slavery and human trafficking:

- expand the audit requirements of prospective suppliers (where appropriate);
- conduct further and regular audits of the actions taken by the management teams in our businesses; and
- increase internal awareness on identifying and responding to incidents of modern slavery and human trafficking.

This statement was approved by the board of directors on 1 May 2018 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Peter Needham
Chairman and Chief Executive
1 May 2018



James Walker Group

Anti-Slavery and Human Trafficking Policy

1. Policy statement

- 1.1 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 or commercial gain. The James Walker Group has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings 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.
- 1.2 The James Walker Group is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery 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 contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. Scope

- 2.1 This policy applies to all persons working for James Walker Group Limited and its subsidiaries or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Responsibility for the policy

- 3.1 The James Walker Group Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The Group Head of Human Resources has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. The Managing Director of each business unit (or such other position that carries delegated responsibility for the entity) is responsible for operational compliance with the policy within their business, including implementing measures with suppliers to ensure modern slavery is not taking place in our supply chain.
- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on James Walker's requirements and the issue of modern slavery in supply chains.
- 3.4 All employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group Head of Human Resources.

4. Compliance with the policy

- 4.1 As an employee within the James Walker Group, you must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 You must notify your manager or the Managing Director of your business or the Group Head of Human Resources or the Chairman of James Walker Group Limited as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the Managing Director of your business or the Group Head of Human Resources as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will engage with our suppliers to give support and guidance to help them understand that coercive, abusive and exploitative work practices in their own business and supply chains is not acceptable in a supplier to our business.
- 4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Managing Director of your business or the Group Head of Human Resources.
- 4.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should raise it through the Grievance Procedure. If the matter is not remedied, and you are an employee, you should notify the Group Head of Human Resources who will ensure the matter is investigated thoroughly and action taken to correct the situation if any detrimental treatment has occurred.

5. Communication and awareness of this policy

- 5.1 Education on this policy, and on the risks our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 5.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breaches of this policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 Other individuals and organisations working on our behalf can expect that the relationship with our business will be terminated, if they breach this policy.