

Anti-Slavery and Human Trafficking Policy

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Document History

Version	Date	Reviewed By	Summary of Changes
Issue 1	November 2017	Board of Directors	Initial issue
Issue 2	July 2026	Board of Directors	Full review: updated to reflect March 2025 Home Office guidance, added risk assessment, training, victim support, KPIs

1. Introduction

Jones Nuttall Ltd maintains relationships with many different organisations in its supply chain, as well as employing a number of people directly. In light of the general law on employment and human rights, and more specifically the Modern Slavery Act 2015 (the 'Act'), the Company has reviewed its processes to determine what measures exist and what further measures are required to prevent slavery and human trafficking from taking place in any part of the business or its supply chain.

The Company is committed to preventing modern slavery and human trafficking occurring within our organisation and to tackling the risk of occurrence in our supply chain. This policy sets out measures we will take towards this and our expectations of our staff and third parties with whom we work.

1.1 What is Slavery?

The Act covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This Policy covers all four activities.

Slavery exists throughout the world, including in developed countries. It is estimated that tens of millions of people around the world today live in some form of modern slavery.

1.2 Identifying slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

The following key signs could indicate that someone may be a slavery or trafficking victim:

- the person does not have their own passport, identification or travel documents;
- the person is acting as though they are being instructed or coached by someone else;
- they allow others to speak for them when spoken to directly;
- they are dropped off at and collected from work;
- the person is withdrawn or they appear frightened;
- the person does not seem to be able to contact friends or family freely; and/or
- the person has limited social interaction or contact with people outside their immediate environment

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it (see Section 6 below).

The Company expects all who have, or seek to have, a business relationship with Jones Nuttall Ltd to familiarise themselves with this policy and to act at all times in a manner consistent with its aims.

Child Labour and Child Exploitation

Jones Nuttall Ltd has a zero-tolerance approach to child labour and the exploitation of children. We will not knowingly employ anyone below the legal minimum working age or engage with suppliers who use child labour or exploit children in any part of their operations or supply chains. We expect all suppliers and business partners to comply with applicable child labour legislation and internationally recognised labour standards, including the International Labour Organisation (ILO) Conventions relating to the minimum age for employment and the worst forms of child labour.

2. Purpose of This Policy

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which involve the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

This policy sets out the approach of Jones Nuttall Ltd with the aim of preventing opportunities for modern slavery to occur within its business or supply chain. The term 'modern slavery' has the meaning given in the Act.

The Company has a zero-tolerance approach to modern slavery. It 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 within the Company or in those of its suppliers.

This policy has been updated in line with the UK Home Office's updated Transparency in Supply Chains (TISC) statutory guidance published in March 2025.

3. Scope

This policy applies to:

- All employees, workers and contractors of Jones Nuttall Ltd
- All directors and officers of the Company

4. Risk Assessment

The Company will undertake a formal risk assessment on a regular basis (and at least annually) to identify and evaluate the risk of modern slavery occurring within its operations and supply chain. This assessment will consider:

- The nature and location of the Company's supply chain, including higher-risk geographies or industries
- The types of labour used by suppliers and sub-contractors
- The vulnerability of particular groups of workers (e.g. migrant workers, agency workers, seasonal workers)
- Known indicators of modern slavery or labour exploitation in relevant sectors

The results of the risk assessment will be used to prioritise due diligence activities, inform supplier engagement, and feed into the Company's annual Modern Slavery Statement.

5. Steps for the Prevention of Modern Slavery

The Company is committed to ensuring transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015.

All employees have an obligation to familiarise themselves with the Company's procedures to help identify and prevent modern slavery. Adherence to this policy forms part of all employees' obligations under their contract of employment.

To underpin compliance with practical steps, the Company has implemented or will implement the following measures:

5.1 Supply Chain Engagement

5.2 Procurement and Contracting

5.3 Due Diligence

5.4 General Recruitment

6. Reporting Modern Slavery or Human Trafficking

The Company encourages anyone affected by modern slavery or human trafficking, or anyone with concerns that someone within the Company's organisation, supply chain or business associates is affected by modern slavery and human trafficking to speak up. If you raise a concern under this policy in good faith, the Company will support you, even if you turn out to be mistaken.

6.1 Whistleblowing Procedure

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be raised. Concerns about suspected modern slavery associated with the Company or its suppliers may be reported as per the whistleblowing policy, which can be found in the Company handbook.

6.2 Circumstances for Reporting

Employees should notify the Company in any of the following circumstances:

- An employee suspects a person acting on behalf of the Company is seeking to exploit another in a way which could amount to modern slavery
- An employee suspects that a person acting on behalf of one of its suppliers is seeking to exploit another in a way which could amount to modern slavery
- An employee has received an approach from any person inviting them to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed
- An employee has information which leads to the reasonable conclusion that a person acting on behalf of Jones Nuttall Ltd or one of its suppliers is preparing to commit, is committing, or has committed an act in contravention of the Modern Slavery Act 2015

6.3 External Reports

The Company also encourages members of the public, or people not employed by us, to raise concerns in confidence directly with a director. Any such concerns will be investigated appropriately.

7. Support for Victims

The Company recognises that individuals subject to modern slavery are victims of serious crime and human rights abuses. If a potential victim of modern slavery is identified in connection with the Company's operations or supply chain, the Company will:

- Treat the individual with dignity and respect and avoid actions that could put them at further risk
- Not take any action that would prejudice a subsequent law enforcement investigation
- Refer or signpost the individual to appropriate support, including the Modern Slavery Helpline (08000 121 700) and the National Referral Mechanism (NRM)
- Cooperate fully with law enforcement and relevant statutory bodies

Employees who become aware of a potential victim should contact a director or HR immediately and should not attempt to handle the situation alone.

8. Responsibility for This Policy

Ultimate responsibility for the prevention of modern slavery rests with the Company's directors. The board of directors has overall responsibility for ensuring this policy and its implementation complies with all legal and ethical obligations.

Managers are responsible for ensuring those reporting to them understand and comply with this policy, and for escalating any concerns without delay.

The HR function is responsible for ensuring training is delivered and records are maintained.

9. Safeguards for Those Who Report

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if those concerns prove to be mistaken. The Company is committed to ensuring no one suffers detrimental treatment as a result of reporting in good faith a suspicion that modern slavery is or may be taking place in any part of its business or supply chain.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously, though anonymity can make investigation more difficult. Individuals are encouraged to put their names to concerns where possible.

Any allegations found to be malicious or vexatious will result in disciplinary action being taken against the individual.

10. Annual Modern Slavery Statement

In addition to this policy, the Company is required under Section 54 of the Modern Slavery Act 2015 to publish an annual Slavery and Human Trafficking Statement (if its turnover meets the relevant threshold). The statement will:

- Be approved by the board of directors
- Be signed by a director
- Be published prominently on the Company's website
- Be published within six months of the end of each financial year
- Cover the six reporting areas recommended by the Home Office: organisational structure and supply chains; policies; due diligence processes; risk assessment and management; KPIs.

The annual statement will build on this policy and provide updated information on the steps taken during the relevant period.

11. Communication and Awareness of This Policy

The Company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the Company's relationship with them. This policy will be made available on the Company's website and in the employee handbook.

12. Review

This policy will be formally reviewed at least annually by the board of directors. It will also be reviewed whenever there are relevant changes in legislation, Home Office guidance, or the Company's operational circumstances. The review history is recorded in the Document History section at the beginning of this policy.

13. Amendments

The Company reserves the right to amend this policy at any time. Any material amendments will be communicated to employees, suppliers and other relevant parties.

14. Board Approval

This policy has been approved by the board of directors of Jones Nuttall Ltd.

Signed:	<i>J McCormick</i>
Name:	Jonathan McCormick
Position:	Director, Jones Nuttall Ltd
Date:	July 2026