James Walker Group Limited

Anti-Slavery and Human Trafficking Statement

27 July 2023

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, and its qualifying subsidiary, James Walker & Co. Limited, to prevent modern slavery and human trafficking in its business and supply chains during the year ending 31 March 2023.

2. Policies

Our global 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 Policy Principles set out our zero-tolerance approach to modern slavery and human trafficking, namely that:

- All workers within our own business or in any of our supply chains must enjoy unhindered freedom of movement, freedom of association and be free to terminate their own employment.
- No worker within our own business or in any of our supply chains should be subjected to any threat of – or actual – violence, harassment or intimidation.
- The confiscation of workers' original identification or travel documents, mobile phones, bank cards or other personal effects is strictly prohibited.
- Worker-paid recruitment fees, the use of child labour and any form of discrimination are also strictly prohibited.

Our global Anti-Slavery and Human Trafficking 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, students, agents, contractors, external consultants, third-party representatives and business partners; and
- our suppliers and, in turn, to their suppliers

all of whom are expected to comply with the policy. This 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 and is issued to suppliers as part of our supplier authorisation process.

3. Our businesses

The diverse nature of our businesses means that their levels of exposure to modern slavery and human trafficking risks in their supply chains varies, depending on factors such as: whether their suppliers are internal (within the James Walker Group) or external; the raw materials used and the countries from which these supplies are sourced.

Suppliers meeting relevant thresholds are asked to complete an anti-slavery questionnaire, to acknowledge their anti-slavery obligations and to undertake due diligence within their own supply chain so as to ensure compliance. Anti-slavery clauses are also included within our legal agreements with our suppliers.

In addition, James Walker businesses worldwide are required to carry out a risk assessment for each of their suppliers and to complete an annual update (which is reviewed by James Walker Group) identifying whether any suppliers are classified as being high risk or operating in high risk areas, with these being subject to additional scrutiny and more regular review.

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;

and form part of our agreements with both existing and new suppliers.

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. This now includes a dedicated online training module for business leaders, together with staff working in procurement, supply chain and HR, with refresher training required to be undertaken every two years.

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 continuing to prevent and combat modern slavery and human trafficking and we continue to take the following steps:

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

This statement was approved by the Board of Directors on 27 July 2023 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Diederik Neeb
Chief Executive Officer
27 July 2023