



Modern Slavery (Anti-Slavery and Human Trafficking) Policy

Introduction

Modern slavery is a crime and a breach 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.

JLE Group Limited has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all its 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.

JLE Group Limited is also committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with the Company's disclosure obligations under the Modern Slavery Act 2015.

JLE Group Limited expects the same high standards from all its contractors, suppliers, and other business partners. As part of its contracting processes, JLE Group includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and JLE Group expects that its suppliers will hold their own suppliers to the same high standards.

Scope

This policy applies to all employees of JLE Group Limited as well its contractors, suppliers, partners, consultants, wholly/partly owned companies and their subsidiaries, and external organisations.

JLE Group has a robust framework of policies, procedures and contractual requirements in place which should already contribute towards the prevention of slavery or human trafficking within the organisation and supply chains. These include, but are not limited to; areas such as:

- risk management
- health and safety
- recruitment
- whistleblowing
- procurement
- terms and conditions and codes of conduct for employees, suppliers, and contractors, as well as stringent and extensive due diligence and checks when recruiting staff or engaging suppliers or contractors

30 Bore Street, Lichfield WS13 6LL.

Managing Director: John Evans

Registration No: 10688496

Due Diligence processes for slavery and human trafficking

As part of JLE Group's initiative to continually identify and mitigate risk, the Company has in place systems/processes to:

- Identify and assess potential risk areas in JLE Group's supply chains, by requiring all suppliers to declare that they are not involved in modern slavery or human trafficking and have not been subject to any investigation in connection with any offence involving slavery or human trafficking
- Mitigate the risk of slavery and human trafficking occurring in JLE Group's supply chains, by including provisions in JLE Group's template contract documentation requiring its suppliers to take appropriate steps to ensure that there is no slavery or human trafficking in their supply chains; and
- JLE Group continues to review its procurement policies regarding tenders and contracts to ensure they reflect best practice and to mitigate against the risk of modern slavery.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in JLE Group's supply chains and its overall business, JLE Group provides training to its employees, and all employees within the Group Procurement and Buying departments have undertaken Ethical Procurement & Buying and Supply training which incorporates modern slavery issues.

Our effectiveness in combating slavery and human trafficking

JLE Group use the following key performance indicator's (KPIs) to measure the effectiveness to ensure that slavery and human trafficking is not taking place in any part of its business' supply chains:

- Supplier screening: The number and type of issues identified on screening suppliers and subcontractors.
- Whistleblowing: The number of reported breaches in the past year.

This year JLE Group will be introducing mandatory annual Modern Slavery Training and will use the additional KPI to measure how effective such training has been in tackling Modern Slavery:

- Training: The number or percentage of staff across the business trained.

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes JLE Group's modern slavery and human trafficking statement for the financial year 1st December 2022 to 30th November 2023.

Review This policy will be reviewed annually and in line with future legislative updates

Signed



John Evans
Managing Director
JLE Group Limited