

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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This statement sets out J Tomlinson Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or in its supply chains.

The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking, is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Responsibility for the Policy

The Directors and senior management team at The Company have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf in any capacity comply with it.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, agents and all third-party business partners).

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Our HR Department are responsible for reviewing all Company Policies on a regular basis and are responsible for ensuring that any new or reviewed Policies are communicated to all employees via email as well as via our Company Intranet.
- **Risk assessments:** The Company carefully adopts a strict vetting process for all prospective employees, including agency workers, ensuring proof of residence and the qualifications to perform the job. This responsibility is shared between the HR department and the recruiting managers.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing Policy
- Equality & Diversity Policy
- Dignity at Work Policy
- Anti-Bribery Policy

Company Philosophy

JTL employees directly 500 employees, all above the minimum wage and aligned to the Living Wage (excluding apprentices). It is our philosophy to employ directly wherever we can generate continuity of employment. Where this is not achievable, we work with our supply chain partners to support our delivery.

Supply Chain Due Diligence

J Tomlinson operates with a commitment to acting ethically and with integrity in its business relationships, and in line with its One Team corporate values. This extends down to its expectations placed on its subcontractors and supply chain, in acting as representatives of J Tomlinson to its customers.

J Tomlinson will not knowingly support or deal with any business involved in slavery or human trafficking and undertakes appropriate due diligence when engaging and working with suppliers. This includes ensuring that:

- Working conditions are both safe and hygienic;
- Child labour is not used;
- No discrimination is practised;
- Wages are both fair and comparable to other employers, and where possible exceed the minimum wage;
- No bribery, corruption, blackmailing, fraud or bullying is permitted.

Training

Training on this policy and the risk our business faces from Modern Slavery and Human Trafficking forms part of the induction process for all individuals joining the business. Regular refresher training will be provided as required.

All people working for us or on our behalf in any capacity must read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy.

Any infringement of this policy will be dealt with swiftly and with the relevant due care and attention, and which may result in the removal of the offending organisation from the supply chain.

Date of next review: 29/11/2025