

JA-POLICY-043 - Modern Slavery and Human Trafficking Policy

Jankel Knowledge Base

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Table of Contents

1 Modern Slavery and Human Trafficking Policy	3
1.1 Scope	3
1.2 Policy Statement.....	3
1.3 Objectives	3
1.4 Commitments	3

1 Modern Slavery and Human Trafficking Policy

1.1 Scope

This policy applies to all employees of Jankel Armouring Limited (JAL) and aims to set out guiding principles, for the scope of activity and procedures relating to modern slavery and human trafficking. Jankel will endeavour to ensure its business operations are free from modern slavery and human trafficking, in line with the latest revision of the Modern Slavery Act.

1.2 Policy Statement

Jankel recognises the potential exposure to modern day slavery or human trafficking for staff or agents engaged by Jankel and within its supply chain. Whilst the majority of our direct suppliers are based in Europe and UK, we recognise that our extended supply chain may originate from around the world.

1.3 Objectives

The objectives of this policy are:

- To carry out audits to check that all our employees are paid at least the National living wage
- To ensure all employees have the right to work in the UK
- We consider our agency labour providers against the Ethical trading Initiative(ETI) base code standards
- To check and follow up any non-conformances raised in a timely manner
- To report any concerns about slavery or trafficking

1.4 Commitments

We shall be a company that anybody working for us, or on our behalf, to support and uphold the following measures to safeguard against modern slavery and human trafficking:

- We have a zero tolerance approach to modern slavery and human trafficking in any part of our business and our supply chains
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and

trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk based approach we may require:

- employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties’ agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

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1 <https://jankel.spectrumhosting.net/confluence/display/KB/viewpage.action?pagelId=328244>
 2 <https://jankel.spectrumhosting.net/confluence/display/~daniel.baldwin@jankel.com>
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