

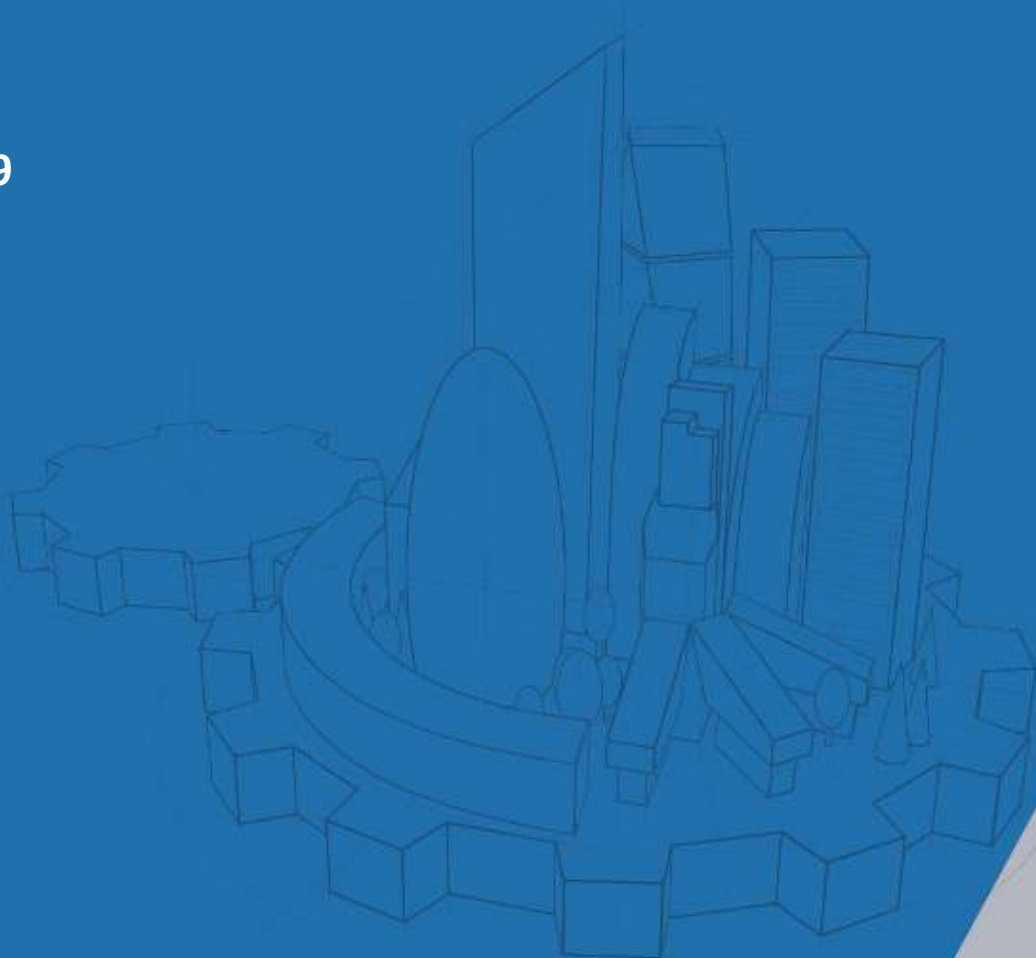


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Anti-Slavery and Human Trafficking Policy

March 2019



Revision	Author	Checked By	Approved By	Date	Review Date	Comments
R001	Anna Stillman	Tom Absalom	Ian Jackson	01.06.16	02.06.17	
R002	Anna Stillman	Tom Absalom	Ian Jackson	31.05.17	01.06.18	Changes to section 1.1 made by Anna Stillman
R003	Anna Stillman	Tom Absalom	Ian Jackson	13.09.18	13.09.19	Appendix added
R004	Compliance Manager	Managing Director	Managing Director	18.3.19		Updated Formatting

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1.0 Policy Statement

Modern slavery is a crime and a violation 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. The notes at appendix 1 to this policy provide information as to what modern slavery is and who it affects. We, which for the purposes of this policy includes JCA Engineering Limited and other JCA companies with the same group of companies, have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our 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.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf (being every company in the JCA Group of companies) in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

2.0 Responsibility for the Policy

The board of directors of each company within the group has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The compliance manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

3.0 Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the compliance manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the compliance manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure, which can be found on the intranet.

4.0 Communication and Awareness of this Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5.0 Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Appendix

What Is Modern Slavery and Who Does It Affect?

Slavery is not an issue confined to history or an issue that only exists in certain countries – It is something that is **still happening today**. It is a global problem and the UK is no exception.

Victims found in the UK come from many different countries, including Romania, Albania, Nigeria, Vietnam and the UK itself, **90 were UK nationals** in 2013.

Poverty, limited opportunities at home, lack of education, unstable social and political conditions, economic imbalances and war are some of the key drivers that contribute to trafficking of victims. What's more, victims can often face more than one type of abuse and slavery, for example if they are sold to another trafficker and then forced into another form of exploitation.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. Someone is in slavery if they are:

- **Forced to work** – Through mental or physical threat
- **Owned or controlled** by an 'employer', usually through mental or physical abuse or the threat of abuse
- **Dehumanised**, treated as a commodity or bought and sold as 'property'
- **Physically constrained** or has restrictions placed on his/her freedom of movement

Contemporary slavery takes various forms and affects people of all ages, gender and races.

Modern slavery can take numerous forms. Perhaps the most common are:

- Child trafficking
- Forced labour/debt bondage
- Forced labour
- Sexual exploitation
- Criminal exploitation (forced to engage in criminal activity)
- Domestic servitude

The construction industry is perceived as a sector at risk in terms of potential engagement in modern slavery. The two categories most likely to affect JCA and our supply chain are:

Forced labour/debt bondage – Victims are forced to work to pay off debts that realistically they will never be able to. Low wages and increased debts mean not only that they can never hope to pay off the debt, but the debt may be passed down to their children.

Forced labour - Victims are forced to work against their will, often working very long hours for little or no pay in dire conditions with verbal or physical threats of violence to them or their families. It can happen in many sectors of our economy, from mining to tarmacking, food packaging to hospitality.