

# **Anti-Slavery Policy Statement**

### This policy's purpose is to:

At JP Holdaway Ltd we have a zero-tolerance approach to modern slavery and we are committed to act to ensure that there is no slavery or human trafficking in any part of our business or supply chains. Our anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships.

We recognise that slavery and human trafficking can occur in many forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all in which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business and to implement prevention steps.

#### **Our Business and Supply Chains:**

We establish relationships of trust and integrity with all our staff and suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety, and environmental standards, and references.

Our recruitment processes are transparent and reviewed regularly. New employees are vetted to ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account.

#### **Risk Assessment and Due Diligence:**

JP Holdaway Ltd have been identifying the risk that modern slavery poses to our business, and reviewing relevant publications such as 'The Modern Slavery Act 2015' via;

- www.gov.uk
- <u>www.hse.gov.uk</u>

Our due diligence processes are aimed to:

- Identify risk areas in our business and supply chain.
- Reduce the risk of slavery from occurring.
- Monitor potential risk areas in our business and supply chain

Whistleblowing:

We encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

#### **Training:**

All JP Holdaway Ltd staff undertake a 'Modern Slavery' Toolbox Talk training session annually so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## Our commitments

JP Holdaway commits to:

## Agreement to follow this policy

The Anti-Slavery Policy is fully supported by senior management and all members of the company have opportunities to review this policy and must comply with it.

Jason Holdaway

J Holdaway

Director

January 2024

| Document<br>ID | Review<br>Date | Revied<br>by | Changes Made | Approved<br>by | Next<br>Review<br>Date      |
|----------------|----------------|--------------|--------------|----------------|-----------------------------|
| Issue 1        | Jan-202<br>4   | JH, LR DC    |              | JH, LR         | Jan 2025<br>or<br>Rectively |
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