

## Jobs 22 Modern Slavery Statement

Jobs 22 has 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 endeavour to ensure that 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.

### Supplier due diligence

Our approved supplier due diligence process includes evaluating every new supplier before appointment and then reviewing them on a regular basis via contract review meetings which are at least annual in occurrence. Should any suppliers fail to live up to our expectations or be unwilling to make any changes we may cease to engage with them.

As part of the initial assessment process all suppliers are required to complete a due diligence checklist questionnaire which contains questions on their recruitment and selection processes, equality and diversity monitoring, information security processes, quality system, business continuity and their supply chain. In particular they will be asked to confirm that they have implemented effective systems and controls to check that modern slavery is not taking place anywhere in their business.

### Key Performance Indicators

Enhancing accountability within our organisation is an essential part of tackling modern slavery and setting and measuring Key Performance Indicators (KPIs) is vital in order to ensure that progress is being made. As such, it's important to consider potential KPIs to measure our company's efforts in this area, so that we can assess the true impact of our initiatives and continuously improve them.

- a. Supplier Compliance – Provider can demonstrate they have a modern slavery policy and are compliant with it.
- b. Incident Reporting and Resolution Rate – Provider can demonstrate any modern slavery incidents reported against the number of incidents resolved satisfactorily.
- c. Risk Mitigation Rate – Provider can identify any high-risk suppliers or supply chain segments and demonstrate where risk mitigation measures have been implemented.
- d. Training Effectiveness - Provider can demonstrate that employees and suppliers are trained on modern slavery awareness.

## Procurement process

Our procurement process includes specific measures to ensure that our compliance under the Act are observed and applied through our supply chain.

We review our standard form of contracts including;

- warranties that no slavery is used anywhere in the supplier's business or by any of the suppliers in its supply chain and that all necessary processes and policies have been put in place to ensure that this remains the case.
- a contractual right to request compliance-related information and the right to audit suppliers at our discretion.
- the addition of indemnity provisions and rights to terminate for breach of our Anti-Slavery policy.

Additionally, our training programmes and delivery are reviewed and updated to ensure that relevant staff are made aware of the risk factors, implications of the Act and implementation of the policy in their areas of responsibility. In particular, the following areas will include anti-slavery and human trafficking elements in their delivery:

- recruitment and selection
- equality and diversity
- procurement and supply chain management
- safeguarding.