



James Walker Group

**Anti-Slavery and Human Trafficking
Statement**

2 May 2019

1. Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by James Walker Group Limited to prevent modern slavery and human trafficking in its business and supply chains during the year ending 31 March 2019.

2. Our businesses

We have a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains. We published our first statement last year; since then we have continued to increase our work in this area and conducted an audit of the actions taken in our businesses to prevent modern slavery.

3. Policies

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and supply chains. The Anti-Slavery Policy sets out our zero-tolerance approach to modern slavery and human trafficking. Every member of staff is expected to comply with the policy which includes raising any concerns and using the appropriate reporting channels at the earliest possible stage.

The policy is available to staff via our internal intranet systems and on our Group website.

4. Supplier conduct

We have a long-standing approach to supply chain responsibility and so expect our suppliers to agree and adhere to our ethical standards for doing business. These standards require (without limitation) suppliers to:

- refrain from holding a person in slavery or servitude or requiring a person to perform any form of forced or compulsory labour;
- not arrange or facilitate the trafficking of any persons;
- not purchase materials or services from companies who use involuntary labour or participate in human trafficking;
- provide, while taking into account the specific dangers of the relevant sector, for safe, hygienic, and healthy working environments for their employees;
- provide, as a minimum, rates of pay at the national legal standards; and
- act in accordance with applicable national and regional laws and regulations at all times.

5. Training

In order to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide guidance and training to our staff where relevant.

We have also published detailed policy guidance to staff on identifying and responding to an incident of modern slavery. This guidance is available via our internal intranet systems.

6. Due diligence processes

We have in place processes to:

- identify and assess potential risk areas in our supply chains (where appropriate);
- audit existing and prospective suppliers (where appropriate);
- mitigate the risk of slavery and human trafficking occurring in our supply chains
- review and record the implementation annually with subsidiary businesses; and
- protect whistle blowers.

7. Further steps

As an organisation, we are committed to building on what we do each year to prevent modern slavery and human trafficking. We intend to take the following further steps to combat modern slavery and human trafficking:

- expand the audit requirements of prospective suppliers (where appropriate);
- conduct further and regular audits of the actions taken by the management teams in our businesses; and
- increase internal awareness on identifying and responding to incidents of modern slavery and human trafficking.

This statement was approved by the board of directors on 2 May 2019 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Peter Needham
Chairman and Chief Executive
2 May 2019