



## **Anti-Slavery and Human Trafficking Policy Statement**

JLES is committed to maintaining the highest ethical standards in its operations and ensuring that Modern Slavery and human trafficking have no place in its business activities or supply chain. As a founding member of the Slave Free Alliance, JLES takes a proactive stance to identify, prevent, and address risks of Modern Slavery. This zero-tolerance approach extends to all relationships with employees, subcontractors, business partners, and suppliers.

This policy applies to all stakeholders, including employees, subcontractors, business partners, and members of the supply chain.

### **About Modern Slavery**

Modern Slavery is a criminal offence under the Modern Slavery Act 2015.

Modern Slavery is the act of a person controlling another for profit by exploiting a vulnerability. This can occur in various forms, but forced labour is the highest risk in a JLES business setting. Forced labour is work that is performed involuntarily or under the menace of a penalty. It refers to situations in which people are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities .

Acts of Modern Slavery will not be tolerated under any circumstances. This policy sets out the Company's goals preventing opportunities for Modern Slavery to occur.

### **Our Standards and Expectations**

To ensure that Modern Slavery is prevented, mitigated and addressed, all employees must:

- At all times and in all respects act in the best interests of the Company and use your best endeavors to promote, develop and extend the company's business and interests.
- Have an awareness of Modern Slavery when operating within a JLES Environment. We expect staff to familiarise themselves and review any relevant literature or training that they are provided with. Engage and familiarise themselves with the anti-Slavery and human trafficking characteristics such as forced labour, bonded labour, human trafficking, descent-based Slavery, child labour, forced and early marriage.
- Take all necessary steps to prevent opportunities for Modern Slavery to arise and to report to the Company areas which may be of risk, such as poor employment practices, overseas suppliers not governed by the Modern Slavery Act 2015 and use of temporary workers.
- Employees should take all necessary steps to work with the company's established supplier list, by engaging with new subcontractors to review and agree to our policy and conditions as part of the Pre--Qualification Questionnaire process.
- Ensure that suppliers are aware of our standards and continuously hold the same standards and approaches towards Modern Slavery and Human Trafficking as a minimum.
- Ensure that they and all suppliers report any risks or potential instances of Modern Slavery to the relevant authorities and through the JLES escalation procedure email address [reporting@jlesgroup.com](mailto:reporting@jlesgroup.com). Employees should seek immediate guidance and not probe or try and resolve a risk, concern or issue themselves.

- Ensure that all statutory checks are made during the recruitment of new employees and that basic employee rights are upheld across the business, particularly concerning pay, working hours, fairness, and equality. This aligns with the internationally recognized Ethical Trading Initiative (ETI) Base Code, which outlines principles of good labor practice.
- Advertise the relevant literature and policies in all JLES environments including offices, active sites; to ensure visibility to all stakeholders.

To ensure that Modern Slavery is prevented, mitigated and addressed, all subcontractors, business partners and supply chain must:

- Familiarise themselves with Modern Slavery as a topic and how it can manifest in business operations and supply chains.
- Follow and engage with our standards as a minimum. We encourage and support you to try to adopt your own procedures. Notify us of any Modern Slavery risks or potential instances of Modern Slavery when working in a JLES environment. Report any risks, concerns, or incidents through the JLES escalation framework by emailing [reporting@jlesgroup.com](mailto:reporting@jlesgroup.com).

As mentioned above, we expect all our suppliers to follow and engage with our standards as a minimum and encourage them to try to adopt their own procedures. Any confirmed cases of Modern Slavery or human trafficking in our supply chain may result in suspension or termination of contract.

This policy is issued to all staff on at least a yearly basis for them to review. It will also be reviewed on an annual basis and is the responsibility of the JLES Group Directors to uphold it to the highest standard.

**Signed**



**For and on behalf of JLES Group Limited**  
**Paul Tomlinson**  
**Director**

**Date**

January 2025

**Review Date**

January 2026

### Report Received

1. A suspicion of modern slavery irregularities may be captured through several means, including the use of email addresses, carrying out of Audits, the operation of management and control procedures.
2. All concerns raised will be treated as confidential, as far as it is possible to do so. Where concerns have implications for a partner organisation or subsidiary company rather than the organisation, the relevant officer at the partner organisation or subsidiary company will be informed.
3. All actual or suspected incidents should be reported without delay to a director or by emailing [reporting@jlesgroup.com](mailto:reporting@jlesgroup.com). Where a concern is raised by a member of staff to their line manager, this should in turn be immediately reported by the manager to their director or the reporting email address.

### Initial Investigation

1. If potential victim or reporting person is present, arrange for a safe and private environment. All information and disclosures are to be kept confidential.
2. Address any immediate welfare needs or requirements.
3. Obtain initial facts.
4. If the victim wishes to, report to local hospital/medical authority of information and create log of progress.
5. Make other ongoing notifications as appropriate

### Risk assessment and investigation plan

1. If incident is potentially a case of Modern Slavery and if the victim wishes to be reported into authorities/national referral mechanism, do so.
2. MS team at Head Office will assess the case and decide the appropriate course of action.

Non-Modern Slavery Incident

The concern qualifies for investigation

If it is a Non-Modern Slavery incident, refer to appropriate department.  
  
Where a decision is taken not to proceed with the matter, further investigations may be subject to review upon receipt of new information.

If it is a potential case of Modern Slavery, refer to appropriate department.

### Investigation

1. If decided that it can be dealt with internally, retain the report on file. If further investigation is needed, forward it to relevant authorities or appropriate agencies (e.g., NGOs, support organisations) (see notes).
2. JLES will co-ordinate with authorities to provide all relevant information. Upon the third party concluding the investigation, relay the outcome to all relevant parties.

### Review and Further Action

1. The JLES MS team will liaise with the relevant authority to decide if further action is required.
2. The JLES MS team will inform the third party/victim of the result of the investigation, and if there is a case of Modern Slavery found within a third party, it may result in suspension or termination of contract.

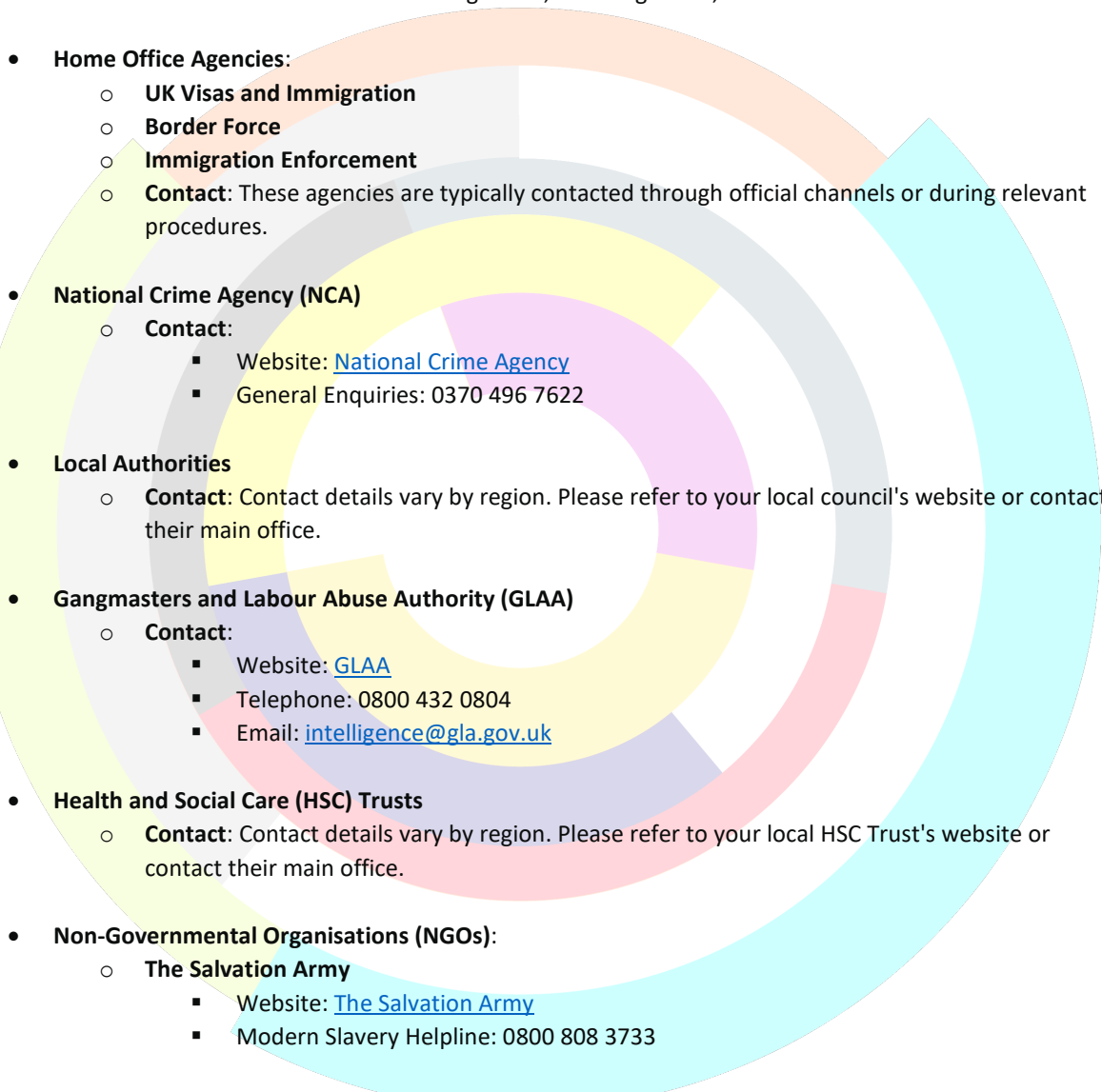
## Modern Slavery Escalation Framework

### Review of Framework

- The JLES Modern Slavery Escalation Framework will be reviewed at least every two years, or at the conclusion of an investigation if sooner.

### Relevant Authorities / Third Parties

If the victim wishes to be reported into the authorities or other relevant third party, it must be reported into one of the below first responders. The first responder organisations are below;

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- **Police Forces**
    - **Contact:** Dial 101 for non-emergencies; in emergencies, dial 999.
  - **Home Office Agencies:**
    - **UK Visas and Immigration**
    - **Border Force**
    - **Immigration Enforcement**
    - **Contact:** These agencies are typically contacted through official channels or during relevant procedures.
  - **National Crime Agency (NCA)**
    - **Contact:**
      - Website: [National Crime Agency](https://www.nca.gov.uk)
      - General Enquiries: 0370 496 7622
  - **Local Authorities**
    - **Contact:** Contact details vary by region. Please refer to your local council's website or contact their main office.
  - **Gangmasters and Labour Abuse Authority (GLAA)**
    - **Contact:**
      - Website: [GLAA](https://www.glaa.gov.uk)
      - Telephone: 0800 432 0804
      - Email: [intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)
  - **Health and Social Care (HSC) Trusts**
    - **Contact:** Contact details vary by region. Please refer to your local HSC Trust's website or contact their main office.
  - **Non-Governmental Organisations (NGOs):**
    - **The Salvation Army**
      - Website: [The Salvation Army](https://www.salvationarmy.org.uk)
      - Modern Slavery Helpline: 0800 808 3733
  - **Migrant Help**
    - Website: [Migrant Help](https://migranthelp.org.uk)
    - Asylum Helpline: 0808 8010 503
  - **Medaille Trust**
    - Website: [Medaille Trust](https://www.medailletrust.org.uk)
    - Telephone: 0161 817 2260
  - **Kalayaan**
    - Website: [Kalayaan](https://www.kalayaan.org.uk)

## Modern Slavery Escalation Framework

- Telephone: 0207 243 2942
- Email: [info@kalayaan.org.uk](mailto:info@kalayaan.org.uk)
- **Barnardo's**
  - Website: [Barnardo's](#)
  - Telephone: 0208 550 8822
- **Unseen**
  - Website: [Unseen](#)
  - Modern Slavery & Exploitation Helpline: 08000 121 700
- **NSPCC (Child Trafficking Advice Centre - CTAC)**
  - Website: [NSPCC](#)
  - Helpline: 0808 800 5000
- **BAWSO**
  - Website: [BAWSO](#)
  - Telephone: 0800 731 8147
- **New Pathways**
  - Website: [New Pathways](#)
  - Telephone: 01685 379 310
- **Refugee Council**
  - Website: [Refugee Council](#)
  - Telephone: 0207 346 6700
- **POPPY Project**
  - Website: POPPY Project
  - Telephone: 0208 748 5824
- **Trafficking Awareness Raising Alliance (TARA)**
  - Website: TARA
  - Telephone: 0141 276 7724

