

Modern Slavery Policy

1. Policy Statement

JL Priestley & Co Limited is committed to preventing modern slavery, forced labour, servitude and human trafficking in all areas of our business and supply chain. We adopt a zero-tolerance approach and expect the same high standards from all employees, contractors, suppliers, and business partners. This policy is issued in accordance with the Modern Slavery Act 2015 and reflects current Home Office guidance.

2. Scope

This policy applies to:

- All employees, directors, officers and temporary workers of JL Priestley & Co Limited
- All contractors, consultants, agency staff and third-party representatives
- All suppliers, distributors, co-packers and service providers engaged by JL Priestley & Co Limited

3. Our Responsibilities

JL Priestley & Co Limited commits to:

- Ensuring no form of forced, bonded or involuntary labour is used
- Ensuring all workers have the **legal right to work** and are employed under fair, transparent terms
- Maintaining safe working conditions and protecting vulnerable individuals
- Conducting due diligence on suppliers, including risk assessments and compliance checks
- Taking a victim-centred approach when responding to any suspected case of modern slavery

4. Supply Chain Due Diligence

We will:

- Assess supply chain risks annually, prioritising higher-risk geographies, sectors or labour-intensive processes
- Require suppliers to confirm compliance with the Modern Slavery Act and our Supplier Code of Conduct
- Include anti-slavery clauses in all new supplier and distributor contracts
- Conduct audits or request evidence of labour standards compliance where risk is identified
- Terminate relationships with suppliers who fail to meet required standards

5. Recruitment Practices

To prevent exploitation, JL Priestley & Co Limited ensures:

- All recruitment is carried out by authorised personnel or reputable agencies
- No recruitment fees are charged to workers
- All employees receive written contracts in a language they understand
- Verification of identity and right-to-work documentation is completed for every worker

6. Training & Awareness

We provide:

- Mandatory training for employees involved in procurement, operations, HR and supplier management
- Guidance on identifying indicators of modern slavery and reporting concerns
- Regular updates to reflect changes in legislation and best practice

7. Reporting Concerns

We encourage all staff, suppliers and partners to report suspicions of modern slavery. Reports can be made through:

- Our confidential whistleblowing channel
- Line managers or HR
- External authorities where appropriate
- All reports are investigated promptly and sensitively. Whistleblowers are protected from retaliation.

8. Governance & Accountability

The Board of JL Priestley & Co Limited holds ultimate responsibility for compliance with the Modern Slavery Act.

- Senior management oversees implementation of this policy across all departments.
- Progress and incidents are reviewed annually and reported in our Modern Slavery Statement.

9. Annual Modern Slavery Statement

If required under Section 54 (turnover £36m+), JL Priestley & Co Limited will publish an annual statement approved by the Board and signed by a Director. The statement will outline:

- Risks identified
- Actions taken during the financial year
- Training delivered
- Supply chain improvements
- Any incidents and remediation steps
- The statement will be published on our website and submitted to the Government registry.

10. Policy Review

This policy is reviewed annually or sooner if legislation or operational circumstances change.

Reviewed 09/02/2026

