

John Henry Group	Prevention of Modern Slavery Policy	
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PURPOSE

The purpose of this Policy is to specify details of the John Henry Group’s approach to fulfilling its commitment to support the elimination of Modern Slavery and fully meet its obligations under the Modern Slavery Act 2015. The Policy aims to ensure all John Henry Group businesses take appropriate steps to confirm their and their suppliers to confirm their commitment as we do to the requirements of the Act.

SCOPE

This Policy applies to all companies that form part of the John Henry Group (John Henry & Sons (Holdings) Ltd). The policy applies to third party suppliers with access to John Henry Group or client property, systems or data, and any other parties working on behalf of the Group.

POLICY STATEMENT

The John Henry Group is committed to supporting the elimination of acts of Modern Slavery and accordingly we acknowledge The Modern Slavery Act 2015. Within our remit, we encourage others to support the following international standards and as such ask our suppliers to confirm their commitment as we do to the:

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Core Conventions of the International Labour Organisation

The John Henry Group Board considers that the adherence with this Act is in line with our Corporate Values and Ethical Code of Conduct which it promotes to all of companies within the Group.

POLICY REQUIREMENT

In accordance with the Human Rights Act 1998, which we apply to all the Group’s businesses, employees, contractors, and sub-contractors, any forced or compulsory labour is prohibited. Employees should not be forced into involuntary labour and coercion at work is not acceptable. The employment models deployed across our Group will be in line with UK law and practices.

POLICY EXCEPTION

This Policy applies to all employees and sub-contract businesses engaged in our works within the John Henry Group with no Exceptions.

RESPONSIBILITIES

The Board of Directors will ensure that this policy is implemented throughout all lines of business. Pursuant to the Modern Slavery Act 2015 we will update and issue this policy (which for the purposes of the Act should be seen as our Statement) annually to confirm the actions taken to ensure that slavery and human trafficking is not taking place in our supply chain or own businesses.

REPORTING

There may be ad-hoc reporting required for UK Government, Corporate Social Responsibility or other agencies and this will be co-ordinated by the policy owners.

Procurement will also report non-compliance and take corrective action with relevant suppliers and internal stakeholders as required.

