



MODERN SLAVERY STATEMENT 2017

Published in accordance with the Modern Slavery Act 2015

Jena UK Limited purchases from a global supply base, including the Far East, Turkey and mainland Europe, in addition to UK based suppliers.

Jena is committed to identifying and working with suppliers whose personal and business ethical standards are compatible with our own. Jena expects its suppliers to be law abiding as individuals and to comply with local legal requirements in the conduct of all their business activities as well as strive for compliance with international standards to promote increased employee protection. This includes compliance with the specific terms of the Jena Code of Practice (based on the ETI Base Code and the UK Modern Slavery Act).

Modern Slavery continues to be at the heart of our business ethical trading programme due to its vast potential as a source of human rights violations. Consequently, during 2017, Jena assessed 2016 activity and took further steps towards raising Modern Slavery profile within the business and supply chain.

MODERN SLAVERY STEPS WITHIN OUR BUSINESS

We have continued to work consistently with the labour providers by conducting regular checks on temporary workers documents, as well as interviewing them. We identified a need to empower migrant workers in situations where their language skills and/or mentality background were not enabling them to voice any concerns. To address this, we have used our own diverse workforce to interview and facilitate full communication between workers and labour providers. We have also put together a pack of leaflets containing relevant information and then translated the pack into all relevant languages for the temporary workers. Finally, we have continued to raise awareness, train and set expectations among labour providers as to their responsibilities in reference to Modern Slavery and ethical trade, while closely monitoring their progress.

Although no Modern Slavery issues were identified during such checks, we have supported the temporary workers in becoming fully aware of their rights and being able to voice their concerns, regardless of their nature.

In addition, we had our own premises audited against the ETI base code again (full audit and follow-up), as well as against customer bespoke ethical code. NCs were swiftly addressed by a dedicated high-profile cross-departmental team, with Sedex visibility.

MODERN SLAVERY STEPS WITHIN OUR SUPPLY CHAIN

As detailed on our 2016 statement, due diligence monitoring is in place via our supplier questionnaire and a bespoke internal audit for Far East and Turkish suppliers. Our vendor questionnaire was further reviewed and streamlined to ensure that all relevant ethical questions are included. In addition, we put together a Modern Slavery pack consisting of a presentation (available in English, Chinese and Vietnamese) and a toolkit. We distributed the pack to our suppliers as a tool to raise



awareness among factory management and workers, as well as setting expectations and providing concrete action steps for the manufacturing sites.

Moreover, we moved to using a market leading third party audit company for our bespoke internal technical/ethical audits on the supply chain. As part of these audits, we enhanced Modern Slavery checks by implementing a dedicated set of questions aimed at assessing supplier awareness of forced labour and check for any occurrence on the ground. 14 internal audits on quality and social compliance were carried out during 2017, in addition to external third party ethical and technical audits requested by our customers.

All of these initiatives have contributed to raise the human rights / ethical trade profile within our business at all levels, with particular focus on Modern Slavery. We have dedicated extended time and resources and as such expanded on current knowledge and experience in this area and we will continue to do so.

During 2018, we will be constantly reviewing and expanding our dedicated tools based on best practice and supplier feedback to the best of our ability and knowledge.

Also, we will expand the range of translated versions of our Modern Slavery presentation to make it accessible to as many factories as possible in their native language. In addition, we will be developing an online portal for our labour providers where temporary workers details can be uploaded, assessed and stored. This portal will improve our current monitoring system by going paperless and automating certain processes to increase efficiency.

Furthermore, we will continue the focus within our own organisation by undergoing another ethical audit at our premises to confirm current labour practices against Smeta 6.0 methodology. We will also adopt and implement a Human Rights policy. We will continue to drive cross-functional awareness of Modern Slavery within our business, championed by the Board of Directors, in order to identify and eliminate potential risk areas within our own business.

Statement was approved by the Board of Directors on 02/07/18

(for the financial year of 2017)

Signed by Director D Sharma Date: 02/07/18

Dharmendra Sharma

Managing Director and member of the Board of Directors approving the statement