

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION

This statement is pursuant to Section 54 of the Modern Slavery Act 2015 and sets out Jonathan Lee Recruitment Limited and Jonathan Lee Contracts Limited (JLR) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the recruitment and engineering sectors, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

We are also signatories to the UN Global Compact and have agreed to adhere to the UN's guiding principles, which means we have stated that we will work to protect human rights in our business and those businesses we work with.

### CURRENT POSITION

- JLR is a recruitment business providing staffing services to companies in the engineering sector. We deliver both permanent and contract based recruitment services to our clients.
- Our supply chain is minimal and solely relates to the operation of the business and services to our clients and contractors.
- The organisation currently operates in the UK – all current operations for JLR are in the UK, as such we do not believe we operate in a “high risk” location for Modern Slavery.
- Whilst we operate in the recruitment sector, which can be considered “high risk” in some facets such as “agency workers”. Our focus on engineering and particularly skilled engineering roles, means that our market is considered by JLR's management team to be “low risk”.
- We are active members of our UK trade body – Recruitment & Employment Confederation (REC) and ensure all our policies and procedures meet or exceed their levels.
- Responsibility for the organisation's anti-slavery initiatives is the Managing Director and through him to the operational managers of the business.
- The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers.
- The organisation operates a range of policies to ensure it complies with the Modern Slavery Act; as noted these are checked via our trade body and meet at least their minimum standards.

## WHISTLEBLOWING POLICY

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can take their concerns to the Managing Director/Chairman.

## EMPLOYEE CODE OF CONDUCT

The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

## SUPPLIER CODE OF CONDUCT

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics.

## ACTIONS FOR 2019

- This due diligence on suppliers is currently in relation to a wide range of issues and will include reviews on actions/statements in relation to the Modern Slavery Act from January 2019.
- Whilst as an organisation we believe we are in a low risk environment, during 2019 we will implement further staff training to ensure all staff are fully aware of the Modern Slavery Act 2015 and both their personal and the organisation's responsibilities under the act. This will include areas such as:
  - How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
  - How to identify the signs of slavery and human trafficking.
  - What initial steps should be taken if slavery or human trafficking is suspected.
  - How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
  - What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.

- In addition, during 2019 management will undertake to review what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, up to and including their removal from the organisation's supply chains.
- As well as training staff, during 2019 the organisation will circulate a series of emails to staff to cover:
  - The basic principles of the Modern Slavery Act 2015.
  - How employers can identify and prevent slavery and human trafficking.
  - What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.
  - What help is available within the business and how to access it.

## APPROVAL

This statement has been approved by the organisation's Board of Directors who will review it annually.

Signed by DAVID HALE  
Managing Director on behalf of the Board of Directors

Date: June 2019