



JORD'S MODERN SLAVERY POLICY

1. Policy Statement

Modern slavery is a criminal offence under the Modern Slavery Act 2018. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Jord International (herein referred to as Jord) with the aim of the prevention of opportunities for modern slavery to occur within Jord or its supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. We require our suppliers to hold their own suppliers to the same high standards.

2. Objectives

Jord have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses.

3. Application

a. Applicability

This policy applies to all individuals working for Jord or on behalf of Jord in any capacity, including employees at all levels, directors, officers, agency workers, agents, contractors, external consultants, third-party representatives and business partners.

b. Authorisation

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training. The Group Commercial Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

c. Communication and awareness

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

4. Process

a. Steps for prevention of Modern Slavery

To underpin our compliance with practical steps, we follow the below measures:

i. Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;

ii. Engage with our suppliers both to convey to them our modern slavery policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain;

iii. Introduce supplier self-reporting for our suppliers on safeguarding controls;



iv. Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities, both routinely and at times of reasonable suspicion.

b. Compliance

All persons working for us or on our behalf in any capacity must:

i. Comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy;

ii. Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and

iii. Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

The following key signs could indicate that someone may be a slavery or trafficking victim. This list is not exhaustive:

- The person is not in possession of their own passport, identification, travel documents or bank account
- The person is acting as though they are being instructed or coached by someone else
- They allow others to speak for them when spoken to directly
- The person is withdrawn, or they appear frightened
- The person does not seem to be able to contact friends or family freely
- The person has limited social interaction or contact with people outside their immediate environment

c. Breaches

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.