



**JFS**  
Joseph Flach & Sons

## **MODERN SLAVERY ACT 2015 POLICY**

Joseph Flach & Sons Ltd (JFS) are committed to the highest level of ethical standards and sound governance arrangements and sets itself high standards of impartiality, integrity and objectivity in relation to the management of its activities.

Modern slavery is a serious crime in which victims are exploited for someone else's gain. It can take many forms, including trafficking of people, forced labour and servitude.

We are committed to ensuring that no modern slavery or human trafficking exists in our supply chain or in any part of our business. We support and sponsor small businesses and we are against any form of forced or involuntary labour.

In line with the Modern Slavery Act, we expect that our suppliers, contractors meet statutory minimum requirements regarding pay and conditions of employment for their employees and their own supply chains. Within our own business we are committed to fair pay and benefits and are a living wage employer.

We are committed to developing and adopting a proactive approach to tackling Modern Slavery and hidden labour exploitation. We will not knowingly trade or partner with any business or organisation which is involved in this shocking practice however remotely or indirectly.

Some of the signs of modern slavery to look out for, include:

- Workers are distrustful of authority.
- Workers look uneasy, unkempt or malnourished.
- Signs of psychological trauma.
- Untreated injuries.
- Evidence of control outside of work.

Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a supplier operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s). We expect our suppliers and contractors to be able to demonstrate that they have steps in place to prevent exploitation of their workforce and supply chain.



Our existing policies, including whistleblowing, allow for employees to confidentially report any such concerns so that they can be investigated.

We audit and review our suppliers annually and we ask them to complete our supplier questionnaire and send us all the accreditations they hold.

Most of our supply chain has been established over many years, so we have formed trusted relationships. We have no evidence that our suppliers are involved in modern slavery. We are not complacent though and always take any opportunity to chat and engage with employees of suppliers to pick up on any signs that modern slavery could be an issue.

If we discovered that there was any form of modern slavery or human trafficking within our supply chain, we would cease trading with that specific organisation and report them to the relevant authorities immediately.

We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

## Document Control

Review date	Version No	Reason for changes	Approved by
12/01/2024	V5	Added the document control	Karen Hensby
09/05/2024	V6	Review of Policy and Improvement of Commitment	Jo Dobson