

## Anti-Slavery and Human Trafficking Policy

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either our own business or in any of our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We also expect the same high standards from all of our suppliers, contractors and other business partners and as part of our contracting processes, it includes specific prohibitions against the use of modern slavery and expects that all our suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. The Company accepts that we have a responsibility through due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment. Health and safety and human rights laws and standards are being met, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants and business partners.

### **Our Business**

A.W. Jenkinson Forest Products operates over 500 vehicles including approximately 200 subcontractors and manage over 1000 movements each day. Transport movements cover the entire UK and parts of Europe and are extremely varied, ranging from mountain top collections of forestry residues to deliveries of wood flake bedding to farms and chipped wood to Panelboard Mills and Biomass Power Stations, recycled materials and green waste products.

### **High Risk Areas**

Our highest risk is from Human Trafficking, people trying to stow people in our vehicles at European Borders.

### **Policies and Controls**

We have internal policies to ensure that we are conducting business in an ethical and transparent manner. These include our Whistleblowing Policy, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. We have a Prevention of Clandestine Entrants procedure to assist drivers in ensuring they are not unwittingly carrying illegal immigrants into the country. All reports are to be fully investigated and appropriate remedial actions taken.

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### **Due Diligence and Audit of Suppliers and Supply Chain**

We undertake due diligence when taking on new suppliers and regularly audit current suppliers by self-assessment documentation as well as visits to site by our H&S Team. We ensure all of our employees are eligible to work in the UK and check licences, certification etc. We encourage all of our staff but particularly our drivers to report any concerns they may have when delivering/collecting loads from our customers.

### **Responsibility for this Policy**

The Board of Directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Giles Watson, Compliance Manager, has day to day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure that are effective in preventing or remediating the risk of modern slavery. He is also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Manager and Transport Controllers are responsible for ensuring that those reporting to them understand and comply with this policy.

### **Training and Communication**

Training is provided on this policy and on the risk to the business from modern slavery at induction and annually as part of the H&S group meetings. H&S representatives will raise the topic of modern slavery with their drivers on a regular basis and bring any concerns to the formal meetings.

All staff will be given training on how to identify exploitation and modern slavery and how to report suspected cases.

Our zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

### **Breach of Policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.