

## **BJSS Policy**

### **Modern Slavery and Human Trafficking**

#### **Definition**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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.

#### **Policy**

BJSS does not tolerate modern slavery or human trafficking in its organisation or in its supply chain. The company is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or supply chain.

BJSS is also committed to ensuring there is transparency in its business and its approach to tackling modern slavery throughout its supply chain, consistent with its disclosure obligations under the Modern Slavery Act 2015. BJSS expects the same high standards from its contractors, suppliers and other business partners, and as part of its contracting processes includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. BJSS expects its suppliers will hold their suppliers to the same high standards.

#### **BJSS Supply Chain**

BJSS supply chain includes:

- Recruitment agencies and suppliers of contract IT resources
- Suppliers of IT equipment, software and services
- Professional services from lawyers, accountants and other advisers
- Office cleaning and other office facilities services
- Print and promotional material production
- Marketing and PR services

#### **Applicability**

This policy applies to everyone working for BJSS or on its behalf in any capacity. Including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it any time.

#### **Responsibility**

The BJSS Board is responsible for ensuring this policy complies with BJSS' legal and ethical obligation, and that all those under its control comply with it.

Divisional Directors are responsible for ensuring compliance in their Divisions and for their supplier relationships. They have 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.

Employees are responsible for ensuring they are familiar with employee policies and guidelines relating to modern slavery and complete any associated compliance training.

### **Compliance**

The prevention, detection and reporting of modern slavery in any part of BJSS' business or supply chains is the responsibility of all those working for BJSS or under its control. Any activity that might lead to, or suggest, a breach of this policy is not permitted.

If you believe or suspect a breach of this policy has occurred in any part of BJSS' business or supply chain, or that it may occur, you must notify your manager or report it in accordance with the Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions in our supply chain constitutes any of the various forms of modern slavery, consult your manager.

BJSS encourages openness and will support anyone who raises genuine concerns in good faith under this policy, regardless of the outcome. The company is committed to ensuring no one suffers any detrimental treatment (including dismissal, disciplinary action, threats or other unfavourable treatment) as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be, taking place in any part of BJSS or its supply chain. If you believe that you have suffered any such treatment, you should inform a Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BJSS' slavery and human trafficking statement for the current financial year.



Glynn Robinson

Managing Director