Jestic Modern Day Slavery Policy



Director's Statement - Modern Slavery Act 2015

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Jestic's slavery and human trafficking statement for the financial year ending December 2023.

Introduction

This statement sets out Jestic's 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. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.

The Senior Management team at Jestic recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Jestic is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains This statement covers the activities of Jestic Ltd.

Risk Assessment Process

The following is the process by which Jestic assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

Contracts with direct and indirect suppliers will include clauses on the Modern Slavery Act and risk factors. Zero tolerance for modern slavery and respect for human rights will be built into our procurement processes, supplier contracts and represented in dialogue with sub-contractors, customers and other business partners.

Relevant Policies

Jestic's Whistleblowing Policy; Jestic adopts a policy relating to Anti-Bribery and Public Interest Disclosure. Jestic encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of Jestic.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing Policy is designed to make it easy for workers to make disclosures, without fear of retribution.

Recruitment / Agency workers' Policy

Jestic uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Going forward over the course of the next 12 months Jestic will monitor the relationship with all agencies in accordance with the provisions of the Modern Slavery Act and if necessary, develop a stand-alone Recruitment Policy to reflect that appropriate consideration has been taken in respect of human trafficking and slavery when recruiting both internal/external employees and contractors.

Due diligence

• Jestic undertakes due diligence when considering taking on new direct and indirect suppliers, and regularly reviews its existing direct and indirect suppliers.

This process includes;

- Evaluating the modern slavery and human trafficking risks of each new direct and indirect supplier by requesting they complete a Modern Slavery Act questionnaire sent via the Jestic commercial department.
- Create a risk profile for each indirect supplier, where appropriate, based on the response within the Modern Slavery Act questionnaire.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan, including the termination of the business relationship.
- Insertion of a Modern Slavery Act clause in our supplier contracts. Contracts with suppliers will include clauses on the Act and risk factors. Zero tolerance for modern slavery and respect for human rights will be built into supplier contracts and represented in dialogue with sub-contractors, customers, and other business partners.

Board Approval

This statement has been approved by Jestic's board of directors, who will review and update it annually. Ben Dale

Managing Director, Jestic Ltd

December 2022 (next review December 2023)