

Anti-Slavery and Human Trafficking Policy

Jackwolf Group Ltd acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

Jackwolf Group Ltd recognises that the delivery of our services involves labour being procured throughout the business and supply chains and understand that this entails the risk that modern slavery may take place.

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's freedom by another in order to exploit them for personal or commercial gain.

Jackwolf Group Ltd are committed to ensuring that there is transparency and accountability in our business and in our approach to tackling modern slavery that is consistent with our disclosure obligations under the Modern Slavery Act 2015. Jackwolf Group Ltd is also committed to implementing systems and processes to ensure that there is zero-tolerance towards any acts of modern slavery within our business and throughout our supply chains.

Jackwolf Group Ltd acknowledges that global business practices could mean there is a risk of Modern Slavery in their supply chain; particularly when sourcing raw materials, products and equipment from overseas. To ensure all those in our supply chain (including contractors) comply with our zero tolerance values we have in place a supply chain compliance action list:

- Engage with suppliers during the Pre-Qualification process to secure a commitment to work with Jackwolf Group Ltd to identify and monitor slavery and human trafficking down the supply chain. Including having their own policy and checks in place.
- Undertake an annual update and review of the supplier Pre-Qualification Questionnaires, including their commitments to work against modern slavery.
- Where possible identify and reduce the number of key suppliers to ensure only trusted and sufficiently vetted suppliers are used.
- Through the PQQ process ensure all hired personnel are correctly employed and their right to work is checked in line with local requirements prior to commencing employment.

In adhering to this policy, Jackwolf Group Ltd agrees to encourage openness and provide support to anyone who raises genuine concerns under this policy; even in error under good faith. We will ensure that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form may be taking place in any part of the business or the business' supply chain.

All employees have a personal responsibility to report any actual or suspected instances of modern slavery throughout the business supply chain. Breaches to this policy may result in disciplinary procedures.

We will communicate this statement to all relevant staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and a full copy of this policy will be accessible to all employees.

The policy will be reviewed annually in line with each financial year and may also be reviewed at other times as required in order to ensure it remains relevant and appropriate to the aims and objectives of the business

The implementation and operation of these procedures underlines our commitment to this policy.

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Page 1 of 2

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Signed: *Ben Cohen*

Date: 16/01/2025

Ben Cohen
Managing Director
Jackwolf Group Ltd

Signed: *Richard Summers*

Date: 16/01/2025

Richard Summers
MEP Director
Jackwolf Group Ltd