

## Modern slavery and human trafficking policy

### Introduction

- 1.1 As a Group, Jupiter maintains relationships with many different organisations in its supply chain, as well as directly employing large numbers of people. Jupiter has a zero-tolerance approach to modern slavery both within the Group and within its supply chain. We have reviewed our existing compliance and risk management processes following the introduction of the Modern Slavery Act 2015 to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains. The policy below underpins our approach, and will be used to inform our annual Statement on Modern Slavery and Human Trafficking.

We respect fundamental human rights and are committed to the principles set out in the United Nations Universal Declaration of Human Rights. We support and respect the protection of human rights within our sphere of influence; in particular the effective elimination of compulsory labour and child labour. We govern all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

This policy applies to all Jupiter Group operations and employees. Jupiter expects equivalent standards of conduct from all persons acting on its behalf, such as suppliers and partners.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is: zero tolerance.

### Purpose of this policy

- 2.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of Jupiter (the “Group”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Human Trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

- 2.2 As a Group, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

### **Steps for the prevention of Modern Slavery**

- 3.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We require our suppliers to hold their own suppliers to the same high standards.
- 3.2 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:
- conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
  - engage with our suppliers both to convey to them our Modern Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain;
  - introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
  - introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

### **Responsibility for the policy**

- 4.1 Ultimate responsibility for the prevention of modern slavery rests with the Group's leadership. The Board of Directors of Jupiter has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

#### 4.2 The company will:

- a) Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- b) Be clear about our recruitment policy (see 5.3 Recruitment)
- c) Examine our supply chains and be clear with key suppliers our expectations regarding the Act (see 5.2 Supply chains)
- d) Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- e) Ensure we have in place an open and transparent grievance process for all staff
- f) Seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- g) Make a clear statement that we take our responsibilities to our employees and our clients seriously (see Modern Slavery and Human Trafficking statement)

#### 4.3 Managers at all levels are responsible for ensuring those reporting to them:

- a) understand and comply with this policy;
- b) are given adequate and regular training on it and the issue of modern slavery.
- c) Listen and be approachable to colleagues
- d) Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- e) Remain alert to indicators of slavery (see 6.0 Identifying slavery)
- f) Raise the awareness and ensure all employees are provided a copy of this policy and be aware of their responsibilities
- g) Use their experience and professional judgement to gauge situations

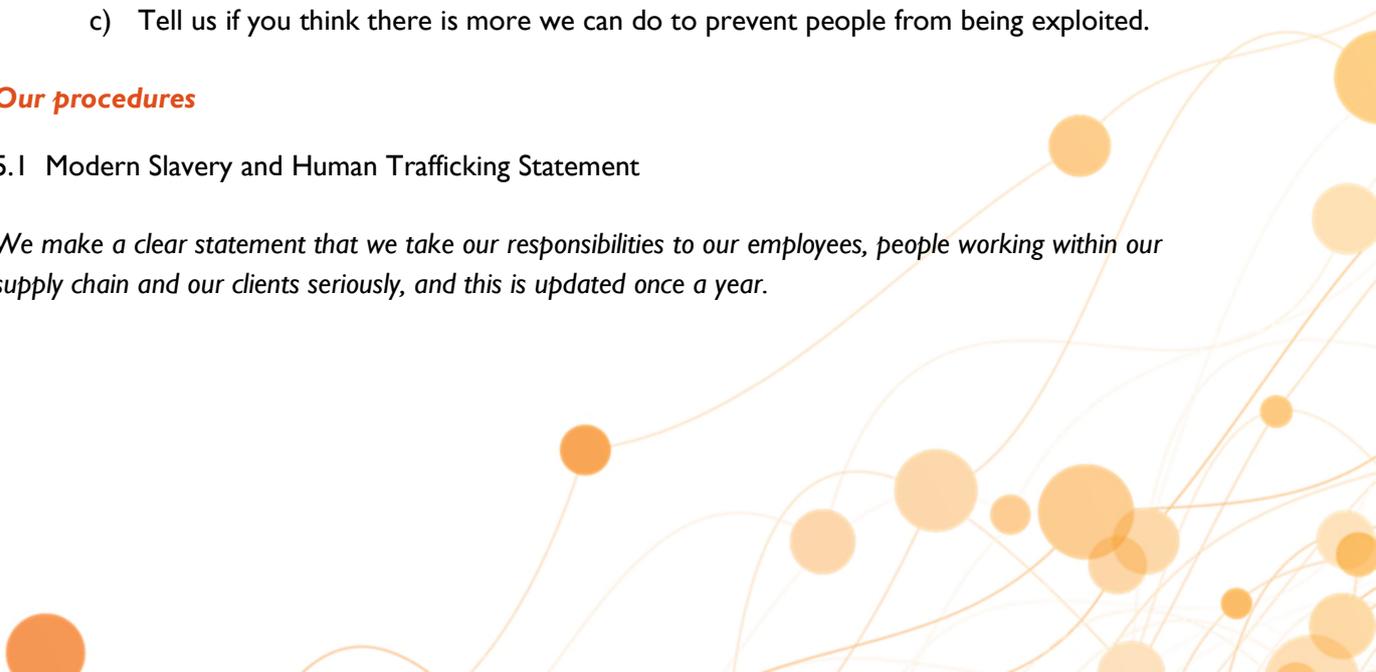
#### 4.2 Colleagues will:

- a) Keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see 7.0 Reporting slavery)
- b) Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- c) Tell us if you think there is more we can do to prevent people from being exploited.

### **Our procedures**

#### 5.1 Modern Slavery and Human Trafficking Statement

*We make a clear statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously, and this is updated once a year.*



## 5.2 Supply Chains

- a) We tell the companies we do business with that we are not prepared to accept any form of exploitation.
- b) From the date of this policy, all relevant supplier contracts will contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.
- c) We apply reasonable due diligence to risk assessing our supply chain and use the following mechanisms to do this:
- d) Supplier mapping initially performed on spend level and then industry sector to identify key vulnerabilities
- e) Risk Assessment of spend areas in relation to the supply chain and their propensity of historically proven risk
- f) Training and knowledge sharing for key Procurement
- g) Ensuring all suppliers deemed “at risk” are fully supportive to the aims of this policy, (including asking for copies of their Modern Slavery Statement and Policies)
- h) Harmonizing those processes which are already mutually inclusive of the aims of this policy into the due diligence.
- i) If any issues are identified then this is escalated to the senior stakeholders in the business, with all methods of remediation to be available (up to and including exiting the relationship with the supplier)

## 5.3 Recruitment

### Using agencies

- a) The Company follows firm policy and only uses agreed specified reputable recruitment agencies.
- b) We expect all recruitment agencies with whom we engage:
  - To fully comply with the Modern Anti-Slavery Act 2015;
  - Are free from ethical ambiguities;
  - Are transparent, accountable and auditable.
- c) If the Company has reason to believe that any recruitment agency has failed to meet these standards, the people team should be informed and any contracts with them would be terminated.

We keep agents on the list under regular reviews

### General Recruitment

- a) We always ensure all staff have a written contract of employment.
- b) We always ensure staff are legally able to work in the UK.
- c) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the people team will be informed and will follow our reporting procedures (See 7.0 Reporting slavery).

## Identifying slavery

6.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it to the people team who will follow our reporting procedures.

## Actions to report modern slavery or human trafficking

### 7.1 Internal

Employees are encouraged to raise any concerns about suspected modern slavery associated with the Group or our suppliers and should do this either through their line manager or the people team.

### 7.2 External

Members of the public or people not employed by the Group to write, in confidence, to the Group Secretary or Head of People Team (either via email or to the registered office) to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

7.3 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental 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 our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

7.4 The Group will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective.

Individuals are therefore encouraged to put their names to allegations.

## ***Training***

We ensure that all employees are made aware of this policy, and their obligation to comply with this policy.

## ***Breaches of this policy***

- 9.1 If an issue is identified with a supplier we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.
- 9.2 We reserve the right terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

## ***Communication and awareness of this policy***

- 10.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## ***Review***

- 11.1 Following its initial adoption, this Modern Slavery and Human Trafficking Policy will be reviewed by the Group's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Modern Slavery and Human Trafficking which will be published annually.

