

# Modern Slavery & Human Trafficking Statement

Commitment / Service Excellence / Teamwork / Trust & Honesty

## Modern Slavery Statement for Financial Year 2019/20

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that James Convenience Retail Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. James Convenience Retail Ltd has a zero-tolerance approach to any form of modern slavery. The Company is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or supply chain.

### **Structure and Supply Chains**

James Convenience Retail Ltd. is a neighbourhood retailer in the private sector, which currently operates 57 convenience stores and newsagents across various locations in England, with a central support function based in Derbyshire.

All employees and contractors of James Convenience Retail Ltd (including all operating Companies), have a clear and unambiguous commitment to comply with the Modern Slavery Act.

The Company deals with UK suppliers and continuously seeks transparency in all business dealings.

### **Policies on Modern Slavery**

The Company operates a number of internal policies to ensure that it is conducting business in an ethical and transparent manner. These include:

- ① Recruitment Policy. The Company operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. All checks are made prior to any offer of employment by the Company.
- ① Grievance Policy and Whistleblowing policy. The Company operates these policies so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. The Company aims 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.

### **Risk Assessment and Due Diligence Processes**

The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for James Convenience Retail Ltd and its subsidiaries. All such persons must avoid any activity that might lead to, or suggest, a breach of this policy statement.

The Company will review its due diligence procedures in relation to modern slavery and human trafficking in the business and supply chain. The Company will also be subject to similar due diligence from its customers.

### **Measuring effectiveness**

The Company will know the effectiveness of the steps that it is taking to ensure that slavery and / or human trafficking is not taking place within the business or supply chain if:

- ❶ No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- ❷ Clear employee records are kept by the Company detailing relevant right to work checks and, when relevant, any concerns raised by colleagues including the steps taken to investigate and any action taken.

### **Training for Staff**

We are committed to ensuring that all of our workers understand the relevant provisions of the Modern Slavery Act and our approach to it, via our internal Company policies.

### **Approval for this Statement**

This statement was approved by the Chief Executive.

**Name:** Mark Titterton

**Signature:** 

**Date:** 21 . 2 . 20

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The Company operates retail outlets across the UK with a central support function based in Derbyshire. The Company deals with UK suppliers and continuously seeks transparency in all business dealings.

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3.5.19