

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

We are committed to improving our practices to ensure that slavery and human trafficking is not taking place anywhere within our business or within our supply chain. We continue to take positive steps to this end and describe below the progress that has been made over the last year.

## ABOUT JLA

JLA was founded in 1973 in West Yorkshire, and has grown to become a leading Critical Asset Supply & Service business offering end-to-end solutions in laundry, catering, fire safety, heating ventilation and air conditioning. Following a number of acquisitions and significant organic growth the JLA Group now employs over 1,100 people including 490 engineers operating across the UK and Ireland.

The JLA Group supplies goods and services to its customers via a number of trading entities and associated group companies and this statement and the commitments made below apply in respect of the entire JLA Group.

JLA is owned by private equity firm Cinven Partners LLP (“Cinven”). Cinven does not tolerate modern slavery and seeks to prevent any form of slavery or human trafficking in its business and supply chains. As an investment advisor it also recognises the importance of engaging with portfolio companies, such as JLA, on this important subject. JLA works with Cinven on an ongoing basis on a variety of Environmental, Social and Governance (ESG) matters. One such matter relates to our commitment to preventing any form of slavery or human trafficking in its business and supply chains through enforcement of the JLA Principles.

## OUR COMMITMENT - THE ‘JLA PRINCIPLES’

JLA has a zero tolerance approach to modern slavery in its business and that of its supply chain. Our [JLA Principles](#) reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing

effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We expect all those in our supply chain to comply with this approach.

## EMPLOYMENT PRACTICES

Our employment practices are compliant with applicable employment and health and safety legislation, and as a result, we are confident that there is no slavery, human trafficking or child exploitation taking place within our organisation. As part of the on-boarding process, all employees are required to provide documentary evidence of their entitlement to work in the UK and all employees are required to hold a UK bank account. JLA is fully compliant with the legislative requirements of both the National Minimum Wage and the National Living Wage. Furthermore, we ensure that the employment agencies that we deal with are also fully compliant with the applicable legislation.

## OUR SUPPLIERS

JLA is proud of the strength and longevity of the relationships that it has with a number of trusted key suppliers both in the UK and around the world. Some of our suppliers have supplied goods to JLA for over 30 years and we work together co-operatively and transparently to ensure that we continue to achieve our joint business aims. The value that our suppliers place on their relationship with JLA has been demonstrated by the positive responses and support we receive from them during the supplier engagement exercise described below.

## OUR DUE DILIGENCE PROCESSES

JLA is an acquisitive business which acquired 6 businesses in 2020 alone. These, coupled with previous acquisitions means that JLA now has a much larger number of supplier relationships which requires a risk based approach in seeking to ensure that there is no slavery or human trafficking in our business or supply chain.

As part of our initiative to identify and mitigate risk, we have for a number of years carried out a review of our equipment supply chain across the Group to identify and assess any areas of potential risk. Given the responses received, the nature of our supplier's business operations and their location we consider the risk to be low. This year that review has included the suppliers within our acquired businesses within the Fire and Heat divisions and we will continue to enhance our supplier due diligence process so that it identifies higher risk relationships across our enlarged supplier base. We will terminate our relationship with any supplier who fails to engage in this process and continue to request that any new supplier confirms their adherence to the JLA Principles as a mandatory part of the supplier on-boarding process.

JLA commenced its onsite audit programme for its key suppliers in 2020 but this programme was hampered by the Covid-19 pandemic. Going forward we will incorporate audits when tendering supply contracts for high risk suppliers in line with our risk-based approach. All tenders issued will include an assessment of the supplier's approach to modern slavery concerns, as well as ESG matters more generally.

Last year we turned our attention to our contractors, and we now include compliance with the Modern Slavery Act and JLA Principles as a key requirement.

## **STAFF TRAINING AND IDENTIFYING RISK**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we continue to take steps to raise awareness amongst our suppliers, contractors and our employees. We will ensure that for any employee involved in the supplier on-boarding process they will have access to and full awareness of the JLA Principles and the supplier due diligence process.

We currently do not have any specific training on the Modern Slavery Act in place. We do however have a comprehensive suite of online training for new employees including on Whistle Blowing. Additionally, all staff have regular compulsory training requirements they must complete to ensure that they are up to

date with the latest legislation and understand the actions they need to take if necessary.

As detailed below we plan to take further steps to enhance knowledge and understanding of modern slavery through relevant training and making them aware that our Whistle Blowing procedure should be followed should they know of or suspect any incidence of Modern Slavery in our business or Supply Chain. We shall make it clear that we take any such reports extremely seriously and we will act on them quickly.

## OUR OBJECTIVES FOR THE NEXT 12 MONTHS

- We will continue to keep the effectiveness of the further steps we have taken this year under review.
- As we continue to move into new sectors and markets we will ensure that we continue to implement our partnership approach to working with our suppliers and ensure that new relationships are based on the same ethical principles to build long term, strong and mutually beneficial partnerships.
- We will ensure that all new businesses joining the JLA group are included in the review process and are educated in and adopt the JLA Principles.
- We intend to develop our risk-based approach in order to effectively identify and manage any modern slavery and human trafficking issues in our supply chain.
- We will continue to invest in our people to ensure that they receive appropriate and adequate training to enable them to identify any potential risks or suspected wrongdoing.

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st October 2020.*



Ben Gujral, CEO