

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 from a focus on commercial laundry has now grown to become a leading Critical Asset Supply & Service business offering end-to-end solutions in laundry, catering, heating, fire safety, compliance and consumables.

Following a number of strategic acquisitions and significant organic growth the JLA Group now employs over 1195 people including 473 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 UK 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 has been working closely with Cinven on a number of important ESG (Environmental Social and Governance) matters and is committed to ensuring that appropriate policies and procedures are in place and embedded throughout the Group. One such policy relates to our commitment to eradicate modern slavery and human trafficking in its business and supply chains through enforcement of the JLA Principles.

OUR SUPPLIERS, SUPPLY CHAIN AND DUE DILIGENCE PROCESSES

JLA is proud of the strength and longevity of the relationships that it has with a number of trusted suppliers both in the UK and around the world and our supplier relationships are of key importance to the success of the Group. 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 have received every year from them during the supplier engagement exercise described below.

Whilst knowledge of and relationships with key suppliers is strong we have this year started a full review of our supply chain from a product, pricing and service perspective but also from a wider ESG angle. We have been conducting on site audits of our equipment suppliers in laundry and catering, to be followed by our newer divisions of fire and HVAC. These audits are carried out in addition to the desk top exercise that takes place as detailed below specifically in respect of modern slavery issues. A supplier evaluation document scores the suppliers across a number of criteria, and this evaluation is then used to create a Supplier Development Programme. A Supplier Development Programme identifies any areas of weakness which we then work with the supplier to address and agree a rectification or improvement plan. This will help to build upon the commitments that may be given by suppliers in response to direct questions around modern slavery but will also validate the responses given.

To begin with, this type of evaluation will focus on the suppliers of equipment for onward supply to our customers, but our focus over the next 12 months is to expand and embed this practice across all procurement activity to provide us with an improved view of risk and corrective action across the entire supply chain. We have already identified that there is more that needs to be done in respect of other suppliers further down the supply chain and we look forward to reporting progress in this regard in our report next year.

OUR COMMITMENT - THE 'JLA PRINCIPLES'

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.

As part of our initiative to identify and mitigate risk, we have for a number of years carried out an annual 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 (with only one supplier identified where the headquarters are located in a "high risk country" according to the Global Slavery Index) we consider the risk to be low. 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.

Our review also includes our contractors, many of whom may be too small to be required to produce their own statements and policies. The aim of the JLA Principles is to translate our requirements into key, easy to follow, transparent rules as to what is and is not acceptable. We have found that this type of messaging works well.

JLA employs almost its entire workforce on direct contracts of employment. 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.

IDENTIFYING RISK AND MONITORING EFFECTIVENESS

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.

POLICIES, TRAINING AND GOVERNANCE

This year we have undertaken a review of a number of our employee policies and carried out some specific training in areas of governance and compliance which have included a focus on bribery and corruption and gifts and hospitality, the introduction of a confidential, independent Whistleblowing helpline and appointment of a Whistleblowing officer, aimed principally at employees to report any suspected wrongdoing. We have also undertaken a piece of work this year on culture and values in order to ensure that as a Group we clearly define and promote what is and is not acceptable at JLA and ensure that our beliefs and values are widely shared and firmly held throughout the Group.

As detailed below we plan to take further steps to enhance knowledge and understanding of corporate governance matters including modern slavery through the introduction of mandatory e-learning and a structured on-boarding process for all new starters.

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 audit and review process and are educated in and adopt the JLA Principles.
- We intend to build on the supplier evaluation audits which have commenced this year in respect of our equipment suppliers and will look to plan to extend this across other areas of the procurement 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 2019. Approved and adopted by the Board of JLA Acquisitions Topco Limited on 24th March 2020.

A handwritten signature in black ink, appearing to read 'H.A.', is positioned above the name of the CEO.

Helen Ashton CEO