

MODERN SLAVERY POLICY

As a company, SJSRM maintains relationships with many different organisations in its supply chain, as well as directly employing a significant number of people. SJSRM has a zero-tolerance approach to modern slavery within the company and throughout its supply chain. We have reviewed our existing compliance and risk management processes following the introduction of the Modern Slavery Act 2015 to determine what measures already exist and what additional steps may be required to prevent slavery and human trafficking in any part of our business or supply chains. The policy below underpins our approach and will inform our annual Statement on Slavery and Human Trafficking.

Our Code of Conduct states that SJSRM respects fundamental human rights and is 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, particularly the effective elimination of forced labour and child labour.

The Code of Conduct governs 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 Code of Conduct applies to all SJSRM operations and employees. SJSRM expects equivalent standards of conduct from all persons acting on its behalf, including suppliers and partners.

We are committed to opposing modern slavery in all its forms and preventing it by any means necessary. We demand the same commitment from all who work for us and expect it from all with whom we have business dealings. Our stance on modern slavery is clear: zero tolerance.

PURPOSE OF THIS POLICY

1.1. Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can take various forms, including servitude, forced or compulsory labour, and human trafficking, all of which involve the deprivation of a person’s liberty by another for personal or commercial gain. This document sets out the policy of SJSRM (the “company”) to prevent opportunities for modern slavery to occur within its businesses or supply chain. The term “modern slavery” used in this policy has the meaning given in the Act.

1.2. 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

2.1 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 our contractors, suppliers, and other business partners. 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.

2.2 While recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking are not occurring 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 measures:

- 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 to convey our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures they have taken to ensure modern slavery is not occurring in their businesses and their supply chains.
- Introduce supplier pre-screening (for example, as part of our tender process) and self-reporting for our suppliers on safeguarding controls.

For instance, the Company supports the legal employment of young workers. Young workers of legal working age have, until the age of 18, the right to be protected from any type of employment or work which, by its nature or the circumstances in which it is carried out, is likely to jeopardise their health, safety, or morals. Therefore, the Company requires all its suppliers to ensure that young workers are treated according to the law; this includes measures to avoid hazardous jobs, night shifts, and ensure minimum wages. Limits for working hours and overtime should be set with special consideration to the workers' young age.

- 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 when there is reasonable suspicion.

RESPONSIBILITY FOR THE POLICY

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

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

- Understand and comply with this policy.
- Are given adequate and regular training on it and the issue of modern slavery.

ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

4.1 Internal employees are encouraged to raise any concerns about suspected modern slavery associated with the company or our suppliers through their line manager.

4.2 External members of the public or people not employed by the company should write, in confidence, to the HR Department to raise any concern, issue, or suspicion of modern slavery in any part of our business or related supply chain.

4.3 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 any form is or may be taking place in any part of our business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

4.4 The company will accept and take seriously concerns communicated anonymously. However, retaining anonymity can render investigations and validation more difficult and make the process less effective. Individuals are therefore encouraged to put their names to allegations.

BREACHES OF THIS POLICY

5.1 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.

5.2 We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

COMMUNICATION AND AWARENESS OF THIS POLICY

6.1 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

7.1 Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors and HR Department regularly (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking, which will be published annually.