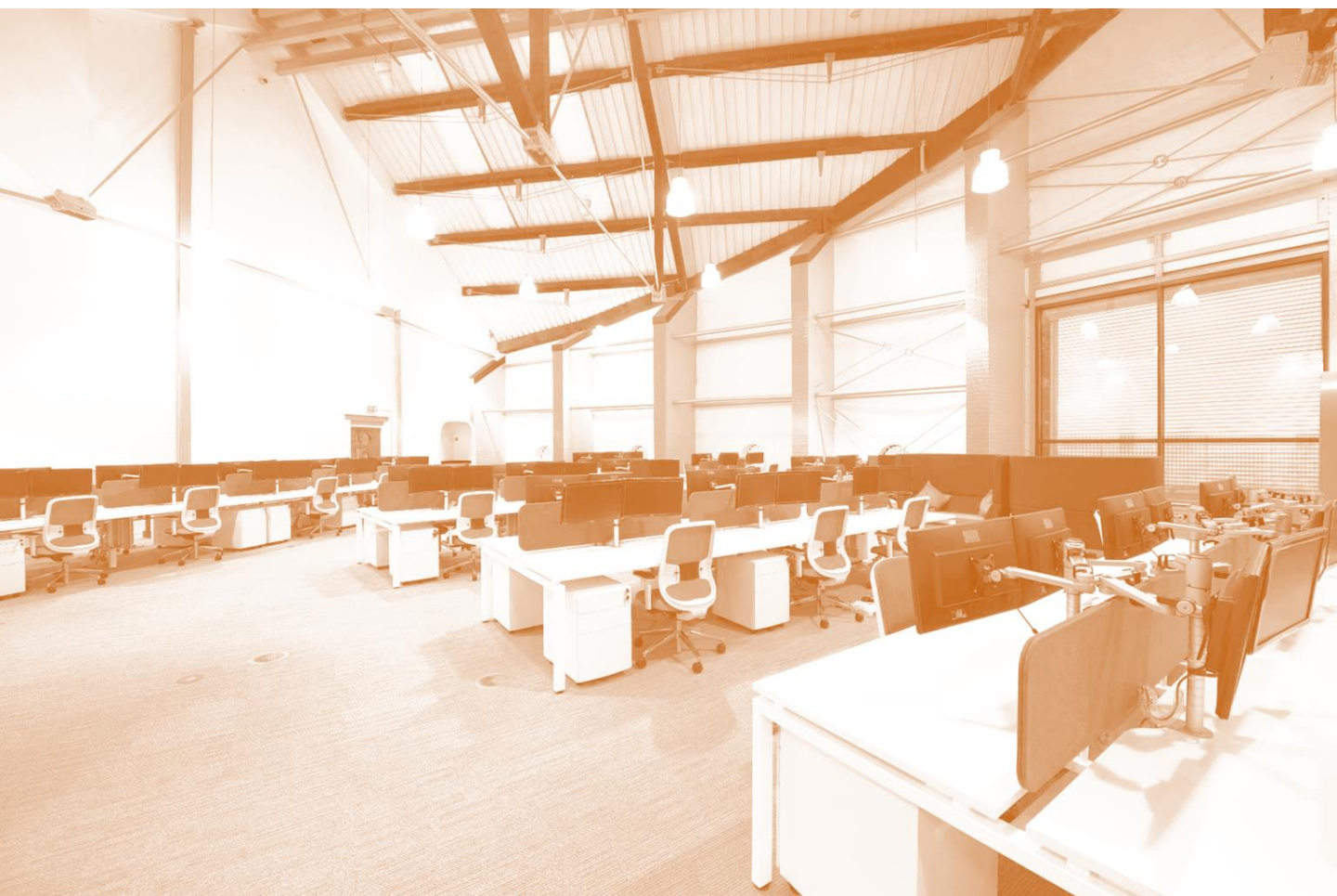




JENNOR
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Jennor [UK] Ltd Modern Slavery Statement

2018



Jennor UK Ltd. 57-59 Brynn Street, St. Helens, Merseyside, WA10 1JB

www.jennor.co.uk



Modern Slavery Act Transparency Statement

Jennor UK Ltd is committed to ensuring adherence to the highest legal and ethical standards. As a company, we adopt a zero tolerance approach to any criminal offence. This is reflected in every aspect of the way we operate, through our commitment to the prevention, deterrence and detection of such acts. We therefore take very seriously the effective prevention of slavery and human trafficking, and will not tolerate this in any form. As well as being illegal, slavery and human trafficking are damaging to all parties who engage in them. Any breach of our policy will be regarded as a serious matter and will result in disciplinary action.

Organisation Structure: -

Jennor UK Ltd is a privately-owned company working as a 'Turnkey Fit-Out' (Internals) Sub-Contractor in the construction/refurbishment/remodelling industry, predominantly in the North West of England and Yorkshire, but occasionally in London and Scotland. Jennor do not have any logistical perimeters.

Our Business: -

We work for the vast majority of what may be perceived as 'Blue Chip' Property Consultants, Landlords, Real Estate Owners, Private Clients and a selection of Main Contractors in all manner of sectors including Health, Residential, Education, Commercial and 'Retail & Leisure', to name just a few and supply and install a selection of trades and services including Mechanical and Electrical, Joinery, Plumbing, Drylining/Partitioning, Suspended Ceilings, Plastering Systems, Demountable Screens and F. F. & E. etc., all of which are installed to the same core expertise and belief ethic that has come to be a byword for quality.

Our Policies: -

Our approach to policy and procedure encompasses all areas of our company. For the avoidance of doubt, this Modern Slavery Act Transparency Statement covers (and represents) the whole of Jennor UK Ltd including the Directors, Staff and all our Site Operatives.

We are fully committed to making sure that no business practice – either our own internally or through our external supply chain/Suppliers – that would contravene Section 54, clause 5 of the Modern Slavery Act are tolerated.

Our commitment to Anti-Slavery Policy is further supported by our Ethical Conduct, Equal Opportunities, Whistle-blowing and Anti-Bribery Policies. These core business policies enforce our commitment to acting ethically and with integrity in all business relationships through the implementation, enforcement and acceptance of set minimal trading requirements across all areas of engagement within our Suppliers and Operatives.

Due diligence and risk awareness: -

Internal employees :-

Adherence to this policy forms part of all employees' obligations under their contract of employment. Employees are required to familiarise themselves with all policies and procedures to assist in the identification and prevention of such criminal acts.

Site Operatives & Suppliers :-

We fully expect that all our Site Operatives meet both legal and ethical standards in their daily operations, while ensuring that compliance is managed appropriately across their own daily duties. We recognise our statutory obligation to set out the steps we have taken as a business to ensure that no acts of modern slavery or human trafficking are evident in our 'on-site' operatives.

To support our commitment, we intend to further develop and implement the following measures: -

- Further develop our recruitment process to incorporate early awareness of actions being undertaken to safeguard our requirements
- Engage with our suppliers (where necessary) to convey our policy requirements and gain an understanding of the measures and controls they have adopted themselves to ensure compliance within their businesses
- Conduct a risk-based approach to the identification of areas in both our own business and wider supply chain/Suppliers that are most exposed to the risks associated with modern slavery, so that efforts can be focussed on those areas
- Develop contractual provisions for our Suppliers to confirm their adherence to our policies while accepting our right to audit their activities and wider supply chain relationships

Training: -

To make sure that our staff and wider supply chain have a high level of understanding of the risks associated with modern slavery and human trafficking, we are committed to providing the appropriate levels of training, and support to all staff members through our robust induction process. All senior managers have been fully briefed on this matter.

Effectiveness: -

To make sure that we monitor our compliance with policy, we will use the following key measures across our company: -

- Completion of all statutory requirements to ensure right to work within the UK
- Development of Supply Chain/Supplier Level Agreements
- Risk-based external audit programme to measure compliance with policy requirements
- Level of personal interaction with Supply Chain members/Suppliers to gauge their understanding of and engagement with our expectations

Declaration: -

This statement is made in accordance with our obligation to Section 54, Clause 5 of the Modern Slavery Act and constitutes our group's slavery and human trafficking statement for the financial year 1st April 2017 to March 31st 2018.