Modern Slavery Policy

QP 037 – Jaybee Supplies Limited

Document Ref	QP 037
Title	Modern Slavery Policy
Version	Revision 3
Prepared By	Jaybee Supplies Ltd
Approved By	Managing Director
Issue Date	21 October 2026
Review	Annually

Key Contacts

Detail	Information
Board-level accountability	Jacqui Pope, Managing Director
Designated point of contact	Alex Holt, Account Manager
Report a concern	01282 50 50 43 · sales@jaybeesupplies.co.uk (subject “Confidential – Modern Slavery”)
Independent helpline	Modern Slavery & Exploitation Helpline: 08000 121 700 (24 hours, confidential)

1. Introduction

Jaybee Supplies Limited is committed to preventing modern slavery and human trafficking in all its forms. We recognise our responsibility to act ethically and with integrity in all our business dealings and relationships, and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This policy reflects the requirements and spirit of the Modern Slavery Act 2015. It applies to all employees, agency workers, contractors and anyone working on our behalf, and sets the standard we expect of our suppliers.

2. Policy Statement

Jaybee Supplies Limited condemns slavery and human trafficking in all its forms and is committed to:

- Complying with all relevant legislation, regulations and international standards relating to modern slavery.
- Upholding the principles of freedom, dignity and human rights for all individuals.

- Ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains.
- Identifying and assessing potential risks of modern slavery in our operations and supply chains, and going beyond minimum legal requirements to seek independent, evidence-based assurance from our suppliers.
- Implementing effective measures to prevent, detect and address any instances of modern slavery.
- Providing training and raising awareness among our employees and stakeholders to recognise and respond to modern slavery risks.
- Collaborating with suppliers, contractors and other business partners to promote transparency and ethical practices throughout our supply chains, including mapping our supply chain beyond first-tier suppliers.

3. Responsibilities

Who	Responsibility
Managing Director (Jacqui Pope)	Board-level accountability for modern slavery compliance; approves this policy; oversees the due diligence programme and decides on action against any supplier.
Account Manager (Alex Holt)	Designated point of contact; receives and logs concerns; manages QP 106 questionnaires and supplier evidence; reports progress against the measures in Section 8.
Managers and supervisors	Make sure their teams understand this policy, and act promptly on any concern raised with them.
All employees, agency workers and contractors	Read and follow this policy; report any concern or suspicion promptly; cooperate with any investigation.

4. Our Own Workforce

- Right-to-work checks are carried out for every new starter before employment begins (QP 076), and original identity documents are never retained.
- All staff are paid at least the Real Living Wage, are paid directly into their own bank accounts, and are never charged fees for recruitment or employment.
- Agency workers are engaged only through reputable, licensed agencies that confirm they meet the same standards.
- Everyone is free to leave their employment with normal notice, and working hours meet the Working Time Regulations 1998.

5. Risk Assessment and Supplier Due Diligence

Jaybee Supplies Limited will conduct regular risk assessments to identify and evaluate the potential risks of modern slavery in its operations and supply chains. This includes:

- Assessing the geographical locations of suppliers and the prevalence of modern slavery in those regions.
- Reviewing the labour practices and working conditions of suppliers and contractors.

- Evaluating the effectiveness of existing controls and monitoring mechanisms.

Due diligence is carried out proportionately, with higher-risk suppliers receiving deeper scrutiny, and is evidenced rather than declaratory. In practice, this means:

- Mapping our supply chain beyond Tier 1 (direct suppliers) to understand, where possible, the Tier 2 and Tier 3 sites (raw materials, fabric mills and finishing) that sit behind the goods we sell.
- Requiring all new and existing suppliers to complete our Supplier Due Diligence Questionnaire (QP 106) as part of onboarding and periodic review, alongside our Approved Supplier Onboarding & Compliance Declaration (QP 060).
- Placing weight on independent, third-party verification, such as Sedex membership with a current SMETA audit, or SA8000/amfori BSCI certification, rather than relying on supplier self-declaration alone.
- Including a supplier code of conduct in our contractual terms (QP 101), with an explicit right to audit, a right to terminate for breach, and a requirement for suppliers to cascade the same standard to their own sub-contractors.
- Seeking assurance that workers within our supply chain have access to a confidential grievance mechanism, keep their own identity documents and wages, and are not liable for recruitment fees (the “Employer Pays” principle).

Based on the findings of risk assessments and completed QP 106 questionnaires, Jaybee Supplies Limited will implement appropriate due diligence measures, up to and including a corrective action plan, audit, or termination of the supplier relationship. Where possible we will work with a supplier to put things right, and with remediation for affected workers, rather than simply walking away.

6. Training and Awareness

All employees receive modern slavery awareness training at induction and a refresher every year, and training is recorded on their training file. Training covers:

- The risks and impacts of modern slavery and human trafficking.
- How to recognise the signs of modern slavery and report a concern effectively.
- Their responsibilities under this policy and relevant legislation.

Staff who select or manage suppliers receive additional guidance on using QP 106 and assessing supplier evidence.

7. Reporting a Concern

- Report any concern or suspicion to Alex Holt, or directly to the Managing Director. You can do this in person, by phone or in writing, and you may report anonymously.
- Concerns are treated in confidence, logged and investigated promptly, and appropriate action is taken in line with applicable law.
- Anyone who raises a genuine concern will be supported and will not suffer any detriment, even if the concern turns out to be mistaken.
- You can also contact the independent **Modern Slavery & Exploitation Helpline on 08000 121 700**. If someone is in immediate danger, call **999**.

8. Monitoring and Compliance

Jaybee Supplies Limited will monitor compliance with this policy on an ongoing basis, including review of completed QP 106 questionnaires and supporting evidence. Progress is reviewed at least annually at management review using these measures:

- Percentage of active suppliers with a completed and current QP 106 questionnaire.
- Percentage of higher-risk suppliers with independent third-party verification.
- Percentage of staff who have completed induction and annual refresher training.
- Number of concerns raised, investigated and closed, and any corrective actions taken with suppliers.

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or of a contractual relationship.

9. Communication

This policy is communicated to all employees, contractors and other relevant stakeholders, shared with suppliers during onboarding, and published on our website.

10. Review and Amendment

This policy is reviewed annually and may be amended in response to changes in legislation, regulations or business operations. Related documents: QP 060 Approved Supplier Onboarding & Compliance Declaration, QP 076 Right to Work Checklist, QP 101 Supplier Agreement, QP 106 Supplier Due Diligence Questionnaire and QP 113 Equality & Diversity Policy.

11. Contact Information

For further information about this policy, or to report any concern or suspicion of modern slavery or human trafficking, please contact **Alex Holt, Account Manager**.

Telephone: 01282 50 50 43

Email: sales@jaybeesupplies.co.uk (subject “Confidential – Modern Slavery”)

Post: Jaybee Supplies Limited, Unit 9, Victoria Mill, Boot Street, Earby, Barnoldswick, BB18 6UX

Authorisation

Signed	Jacqui Pope
Name	Jacqui Pope
Position	Managing Director
Date	21 October 2026