

JBS Modern Slavery Act Statement & Ethical Procurement Policy

Reviewed 8 July 2026, covering the year to 31st Dec 2025

About this statement

This statement is made under section 54 of the UK Modern Slavery Act 2015 and covers James Boylan Safety Ltd, James Boylan Safety (NI) Ltd, Romar Innovate Ltd, Anderco Safety (UK) Ltd and Anderco Safety (Irl) Ltd, together JBS Group. It sets out what we have done during the year to 31 December 2025 to prevent modern slavery and human trafficking in our business and supply chain.

Our customers, including public sector bodies, expect us to know our supply chain. This statement, and our Ethical Procurement Policy that follows it, set out how we meet that expectation.

Our structure, business and supply chain

We supply workwear, PPE and uniforms in Ireland and the UK, operating warehouses in Monaghan, Glasgow and Leconfield. We source garments, fabrics, footwear, gloves and technical PPE from more than 50 countries, through Tier 1 finished-goods manufacturers, Tier 2 fabric mills and accessory suppliers, and Tier 3 raw-material processors. Contracted freight forwarders and domestic couriers move goods through this chain, which we audit every year.

The Modern Slavery Act 2015

The Act consolidates UK slavery and trafficking offences, strengthens courts' powers to seize traffickers' assets, and *requires large businesses to report annually on what they are doing to keep slavery and trafficking out of their operations and supply chains*. This statement is our report.

Our commitment

On behalf of JBS Group, we confirm: **JBS Group is against any form of human trafficking or slavery — the recruitment, movement, harbouring or receiving of children, women or men through force, coercion, abuse of vulnerability, deception or other means, for the purpose of exploitation.**

Declan O'Donnell, JBS Managing Director, together with JBS Compliance and JBS Procurement, has reviewed our direct relationships with suppliers and manufacturers. Our sourcing touches several countries carrying low to high modern slavery risk, including Albania, Bangladesh, Cambodia, China, Indonesia, Myanmar, South Africa, Taiwan, Thailand and Tunisia. The table below sets out how we manage that risk, country by country.

What we do

- 1) **Supplier sign-up.** Every JBS supplier signs **the JBS Code of Conduct and the Ethical Trading Initiative's Base Code**, which sets out workers' core rights.

- 2) **Annual self-assessment.** Suppliers complete our **JBS Supplier Annual Self-Assessment Form** — forty questions backed by supporting certification. We assess around 200 suppliers a year this way and follow up directly with any supplier whose answers raise concern.
- 3) **Vendor reviews.** JBS Procurement holds one-to-one **JBS Vendor Reviews** with suppliers where trafficking or slavery risk is higher. We have found no evidence of modern slavery in our supply chain, or within JBS Group, to date.
- 4) **Independent audit.** We get **independent 3rd parties to audit our suppliers.**
 - a) **Sedex** carries out SMETA four-pillar reviews.
 - b) **AndWider** speaks directly with supplier staff to check working conditions on the ground.
 - c) **IndustriALL** audits worker rights where relevant.
- 5) **Supply chain mapping.** JBS requires Suppliers to map and audit their own upstream manufacturers, and confirm annually that they meet the Modern Slavery Act's requirements in turn.

Risk areas

Our highest risk sits in Tier 1 and Tier 2 garment manufacturing in the countries above, with further exposure from seasonal subcontracting, migrant labour, overtime, piece-rate pay and weak worker representation. We assess these risks through supplier self-assessment, worker interviews, third-party audits and supply chain mapping, and prioritise corrective action for any supplier showing gaps in recruitment practice, working hours or worker voice.

Country risk and our response

Country	Risk level	Our response
Bangladesh	High	We restrict subcontracting, run direct worker interviews and use Sedex and AndWider audits to improve visibility of subcontracted sites.
China	High	We do not source from Xinjiang. Suppliers must provide traceable supply chain data and pass SMETA four-pillar audits.
Myanmar	Severe	We exited Myanmar in 2021 following the coup. Any return would require unannounced audits and direct worker engagement through AndWider or IndustriALL.
Indonesia	Moderate–High	We are extending local NGO partnerships to strengthen grievance mechanisms for migrant workers.
Thailand	High (garment sector)	We run rigorous supplier assessments and require worker-paid recruitment to prevent debt bondage.
Cambodia	Moderate–High	We prioritise direct supplier relationships over subcontracting and require ILO-aligned employment contracts.

Country	Risk level	Our response
Albania & Tunisia	Moderate	We work with EU-based suppliers and ethical trade partners to strengthen worker representation.
Taiwan	Low–Moderate	We check the recruitment agencies our suppliers use and audit for passport retention or excessive overtime.
South Africa	Moderate–High	We require full supply chain transparency and evidence of compliance with South African labour law and ILO standards.

Looking ahead

Over the next year, we will:

- a) **Deeper contract terms.** Extend the 2025 update to **JBS Supplier Contracts**, mandating ethical sourcing clauses and confirming no recruitment fees are charged to workers.
- b) **Unannounced audits.** Move a share of SMETA and AndWider audits in our highest-risk countries to unannounced visits.
- c) **Full upstream mapping.** Require every Tier 1 supplier sourcing from a Moderate-risk country or above to map and disclose their own subcontractors.
- d) **Myanmar review.** Keep our 2021 exit from Myanmar under review; any return would require unannounced audits and direct worker engagement before we resume sourcing.
- e) **Direct worker access.** Extend anonymous whistleblowing access to factory-floor workers directly, not only through JBS suppliers.

We aim to report progress against these actions in next year's statement.

Training and raising concerns

We raise awareness & train JBS procurement, quality and warehouse staff every year on the Modern Slavery Act, trafficking indicators, high-risk supply chain behaviour, responsible recruitment, and how to raise a concern. (We so 20 hrs annual training per person).

JBS Suppliers receive guidance packs setting out our expectations on worker rights and ethical recruitment. Staff and suppliers can report suspected modern slavery through our whistleblowing channel, in confidence and without fear of reprisal.

Measuring effectiveness (KPIs):

- 1) self-assessment completion rate (typically over 90% completions)
- 2) number of SMETA or equivalent audits completed
- 3) corrective action closure rate
- 4) whistleblowing reports received

5) staff training completion rate

We review these at every audit cycle and change our approach where they show risk is not falling.

Approval

This statement was approved by the JBS Group Board on 8 July 2026.

Signed by Grattan Boylan,

JBS Group Chair, on behalf of the JBS Group Board.

Related resources

- A) Supply Chain Sustainability School — <https://www.supplychainschool.co.uk>
- B) Anti-Slavery International — <https://www.antislavery.org/>
- C) Verité — <https://www.verite.org/resources/>
- D) Gov.uk — Modern Slavery Bill — <https://www.gov.uk/government/collections/modern-slavery-bill>
- E) UK Legislation — <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- F) Business & Human Rights Resource Centre — <https://www.business-humanrights.org/en/>
- G) Fair Labor Association — <https://www.fairlabor.org/>
- H) Global Slavery Index — <https://www.globalslaveryindex.org/>
- I) Gangmasters & Labour Abuse Authority — <https://www.gla.gov.uk/>
- J) Ethical Trading Initiative — <https://www.ethicaltrade.org/>
- K) International Labour Organisation — <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>
- L) OECD — Ending Child Labour, Forced Labour and Human Trafficking — <https://www.oecd.org/investment/ending-child-labour-forced-labour-and-human-trafficking-in-global-supply-chains.htm>

JBS Ethical Procurement Policy

External drivers

These factors shape our choice of supplier, and of where in the world we buy from:

- 1) **Economic** — exchange rates, margin, duties, tariffs, insurance and resource availability. Sustainable innovation can open new market space for our products.
- 2) **Technological** — real-time communication lets suppliers in developing markets compete on equal terms.
- 3) **Legislation** — social, technical, environmental and competition law, all of which shape what we can buy and from whom.
- 4) **Social** — consumers and clients increasingly expect us to avoid worker exploitation, and worker satisfaction improves productivity.
- 5) **Environmental** — energy use, reusable and non-toxic materials, waste reduction and lower carbon in the supply chain.

Our response

Because unethical procurement is a business risk, not just an ethical one, our Code of Conduct sets minimum standards for procurement beyond cost alone. It requires us to:

- 1) share audit reports and other information suppliers need to plan effectively
- 2) run efficient, formalised buying and production processes
- 3) reward suppliers who show good practice and leadership
- 4) work with organisations that have expertise in systemic supply chain problems
- 5) identify and act on unacceptable practice, including fraud, bribery and modern slavery
- 6) coordinate with other buyers sourcing from the same supplier, where useful

Suppliers are responsible for good workplace practice; we are responsible for selecting, encouraging and rewarding it. Where performance falls short of our minimum standards, we treat it as a priority, not a footnote.

The JBS procurement cycle

Our procurement cycle has seven stages. Stages 1 and 7 set policy for all purchasing; Stages 2 to 6 apply to each individual purchase. Michelle McCabe, JBS Head of Procurement, owns the cycle and reports risk findings to Declan O'Donnell, Managing Director, and to JBS Compliance.

- 1) **Stage 1 — Risk identification.** JBS Procurement and JBS Compliance identify risks, threats and vulnerabilities (RTVs) across the supply chain each year, and use the findings to prioritise due diligence and purchasing decisions.

- 2) **Stage 2 — Setting the specification.** Buyers build technical, social and environmental criteria into each specification against the JBS Code of Conduct, so ethical standards are set before we approach the market, not after.
- 3) **Stage 3 — Supplier engagement.** We assess suppliers against our standards and against the economic circumstances of their workforce, then feed market findings and sourcing timelines back to internal stakeholders.
- 4) **Stage 4 — Shortlisting.** Shortlisted suppliers commit in writing to environmental and social performance standards before they quote.
- 5) **Stage 5 — Supplier selection.** Michelle McCabe and JBS Procurement review pre-qualification questionnaires, tenders and audit reports, weighing social and environmental performance alongside price rather than after it.
- 6) **Stage 6 — Contract and performance management.** Ethical procurement KPIs and sustainability targets go into the contract and the specification. Buyers manage supplier performance against them and escalate any gap into a corrective action plan.
- 7) **Stage 7 — Programme review.** JBS Procurement updates the ethical procurement programme annually: sharing good practice, identifying the root cause of any shortfall, and acting on it before the next cycle begins.

