JBS Modern Slavery Act Statement & Ethical Procurement Policy

This statement is made in accordance with section 54 (5) of the UK Modern Slavery Act 2015. JBS Management applies it to all companies within JBS Group, despite the individual companies *not* being legally obliged to comply. These companies include: James Boylan Safety Ltd, James Boylan Safety (Ni) Ltd., Romar Innovate Ltd., Anderco Safety (UK) Ltd. and Anderco Safety (Irl) Ltd.

JBS Group is an ethical supplier. To continue being an ethical supplier, our staff and our suppliers must all be aware of the areas where ethics might be compromised. Slavery is one such red line area. Hence this statement and policy:- to create awareness and compliance guidelines to ensure ethical trading within JBS Supply chain at all times.

JBS Structure, Business and Supply Chains

We trade as a supplier of workwear, PPE and uniforms in Ireland and the UK. We operate warehouses in Monaghan, Cork, Glasgow and Leconfield. We source garments, fabrics, footwear, gloves and technical PPE from more than 50 countries. Our supply chain includes Tier-1 finished-goods manufacturers, Tier-2 fabric mills and accessory suppliers, and Tier-3 raw-material processors. We transport goods through contracted freight forwarders and domestic couriers. This gives JBS a clear upstream supply chain that we audit each year.

Modern Slavery Act 2015 Overview

The UK Modern Slavery Act was enacted on 26 March 2015. The act consolidates slavery and trafficking offenses. It ensures that the main offences are subject to the toughest asset recovery regime. It introduces bespoke slavery and trafficking compensation orders.

The act includes provisions to:

- *Enable the UK Secretary of State to make regulations relating to the identification of and support for victims*
- *Make provision for independent child trafficking advocates*
- *Require businesses over a certain size (£36m) and threshold to* ***disclose each year what action they have taken to ensure that slavery and human trafficking is not happening in their business or supply chain***.

This latter point is most relevant to JBS and our Suppliers: because we seek to be proactive in

a) ensuring no slavery in our supply chain
and
b) disclosing our actions and our suppliers' actions to prevent slavery in the supply chain.

JBS Anti-Slavery Statement:

On behalf of JBS Group, I confirm that:

1) JBS is against any form of human trafficking or slavery.
   (**Modern Slavery being *"the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means, for the purpose of exploitation"*.**)
2) JBS Management, led by Declan O'Donnell MD, JBS Compliance and JBS Procurement have recently reviewed JBS direct relations with our suppliers and manufacturers. We are aware that countries such as Albania, Bangladesh, Cambodia, China, Indonesia, Myanmar, South Africa, Taiwan, Thailand, Tunisia, all are low to moderate to high risk:
3) We take these 5 following actions to mitigate any possible modern slavery in our supply chain:-
   a) We get JBS suppliers to sign up to the **JBS Code of Conduct** and the Ethical Trading Initiative 9 Point Base Plan, which specifically upholds workers' rights.

   b) We get our suppliers to fill the **JBS Supplier's Annual Self-Assessment Form** – a series of 40 questions which, when answered and with the required supporting certifications, give us a clear insight into their level of compliance. JBs typically assesses almost 200 such suppliers, each year. On the basis of their responses (eg non compliance), JBS will engage deeper with certain suppliers to get them to take corrective action.

   c) We conduct one-on-one **JBS Vendor Reviews: these are reviews** between JBS Procurement and JBS suppliers, wherein there could be a risk of human traffic/slavery. (There is no evidence of modern slavery within our supply chain, nor within JBS Group, at the time of writing.)

   d) We get **independent 3rd parties to audit our suppliers**: Such audits include those conducted by:
      1) Sedex, being the SMETA 4 Pillars ethical review;
      2) also including audits by www.AndWider.com – an independent 3rd party which makes direct contact with JBS supplier's staff – to ascertain the actual working conditions etc from individual staff;
      3) and on occasion including audits by IndustriALL – which has a focus on workers rights.

   e) **Supply Chain Mapping: We require JBS suppliers to look into their own upstream supply chains** and audit *their* manufacturers - to check how they conform to (anti) modern slavery requirements. JBS Suppliers confirm annually that they too comply with the requirements of the Modern Slavery Act.

4) **JBS Risk Areas in Our Business and Supply Chain**
   The highest risks lie in Tier-1 and Tier-2 garment manufacturing in the regions we list as high-risk. Additional risk sits in seasonal subcontracting, migrant labour used by some factories, and any part of our chain where overtime, piece-rate pay, or lack of worker representation may occur. JBS assesses these risk areas through annual supplier self-assessment, direct worker interviews, third-party social audits, and supply chain mapping. We prioritise corrective action plans for any supplier showing gaps in ethical recruitment, working hours management or worker voice.
5) JBS commits to continue to raise **awareness of the risks of slavery** and human trafficking with our staff and suppliers. JBS trains procurement, quality and warehouse staff each year: The training covers the Modern Slavery Act 2015; indicators of trafficking; high-risk supply chain behaviours; responsible recruitment principles; and the process for raising concerns through the JBS whistleblowing channel. We also issue guidance packs to suppliers so they understand JBS's expectations on worker rights and ethical recruitment.
6) JBS has in place a **whistleblowing mechanism** where JBS staff/Suppliers can report Modern Slavery contraventions anonymously.
7) We track our effectiveness through clear KPIs. These include:
   a) the percentage of suppliers completing annual self-assessment;
   b) the number of SMETA or equivalent social audits completed;
   c) the rate at which suppliers close corrective actions;
   d) the number of whistleblowing cases reported;
   e) and training completion rates for JBS staff.

   We review these indicators at each audit cycle to confirm that our measures reduce the risk of slavery or trafficking in the JBS supply chain.

Grattan Boylan,
JBS Chair,
Reviewed **Dec 2nd 2025,** covering the preceding financial & calendar year.

Relevant related links:
JBS Group refers to Modern Slavery - Supply Chain Sustainability School (supplychainschool.co.uk) for best guidance on this topic
Anti-slavery International - https://www.antislavery.org/
• Vertie - https://www.verite.org/resources/
• Gov.uk - https://www.gov.uk/government/collections/modern-slavery-bill
• UK Legislation - https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted
• Human rights - https://www.business-humanrights.org/en/
• Fair Labour association - https://www.fairlabor.org/
• Global Slavery Index - https://www.globalslaveryindex.org/
• Gangmasters & Labour Abuse Authority - https://www.gla.gov.uk/
• Ethical Trading Initiative - https://www.ethicaltrade.org/
• International Labour Organisation - https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm

- OCED - https://www.oecd.org/investment/ending-child-labour-forced-labour-and-human-trafficking-in-global-supply-chains.htm

Modern Slavery active mitigation example:

JBS sources from 50+ countries, but 9 of those have significant **modern slavery risks.** This is due to weak labour protections, political instability, high rates of forced labour, and inadequate law enforcement. Based on the Global Slavery Index, ITUC Global Rights Index, and reports from ILO and Human Rights Watch, the following countries in JBS's past/potential supply chain are considered high-risk:

1. Bangladesh – High Risk

- **Risks**: Widespread child labour, forced labour, and poor working conditions in garment and textile factories. Supply chains often include unauthorised subcontracting, making visibility difficult.
- **Mitigation**: JBS now audits each supplier; we restrict subcontracting, and we ensure worker voice mechanisms (e.g., direct worker interviews). Partnering with Sedex and independent auditors like AndWider has improved oversight.

2. China – High Risk

- **Risks**: State-imposed forced labour, particularly in Xinjiang (Uyghur region). Factories may employ migrant workers with restricted rights, and the government restricts external audits.
- **Mitigation**: JBS avoids sourcing from Xinjiang; we require suppliers to provide transparent, traceable supply chain data. Independent social audits (e.g., SMETA 4-Pillar audits) are mandatory.

3. Myanmar – Severe Risk

- **Risks**: Military control of industries, child labour, and widespread forced labour, especially in textile factories. The 2021 coup led to severe worker rights violations.
- **Mitigation**: JBS exited **Myanmar** in 2021 when the coup happened. If sourcing ever resumes our audits would be frequent and unannounced, with direct worker engagement through third-party organisations like AndWider/ IndustriALL.

4. Indonesia – Moderate-High Risk

- **Risks**: High rates of exploitation of migrant workers, low wages, and forced overtime. Labour unions are often suppressed.
- **Mitigation**: JBS should partner with local labour NGOs to monitor compliance and ensure strong grievance mechanisms are in place for workers.

5. Thailand – High Risk in Certain Sectors

- **Risks**: Widespread forced labour in garment industry. Migrant workers (from Myanmar, Cambodia) face severe exploitation.
- **Mitigation**: JBS conducts rigorous supplier assessments and insist on worker-paid recruitment policies to avoid debt bondage.

6. Cambodia – Moderate-High Risk

- **Risks**: Child labour, debt bondage, and forced labour are prevalent in the textile industry. Many workers operate without formal contracts.
- **Mitigation**: JBS prioritises direct supplier relationships to avoid subcontracting risks and demands ILO-aligned employment contracts.

7. Albania & Tunisia – Moderate Risk

- **Risks**: Labour exploitation exists, particularly for women workers in garment and textile industries. Enforcement of labour laws is weak.
- **Mitigation**: JBS works with reputable EU supply partners and insists on worker representation initiatives; they also work with EU-based ethical trade organisations to enhance protections.

8.Taiwan – Low to Moderate Risk

- **Risks**: Taiwan has strong labour laws, but forced labour risks exist in migrant worker sectors. Many migrant workers (mainly from Indonesia, Vietnam, and the Philippines) pay high recruitment fees, leading to debt bondage. Reports indicate cases of excessive overtime, passport confiscation, and lack of freedom of movement.
- **Mitigation**: JBS checks that suppliers in Taiwan do not recruit migrant workers through exploitative agencies. Suppliers must adhere to ethical recruitment practices (worker-paid recruitment) and be regularly audited for working conditions. Supplier self-assessments and worker interviews will help identify potential issues.

9.South Africa – Moderate to High Risk

- **Risks**: South Africa has a high unemployment rate and widespread informal employment, making workers vulnerable to exploitative conditions. Reports highlight forced labour in agriculture, mining, and textiles, especially for migrant workers from neighbouring countries (Zimbabwe, Mozambique, Malawi). Labour trafficking is a concern, particularly in rural areas.
- **Mitigation**: JBS requires detailed supply chain transparency from our South African supplier. Regular third-party audits, worker representation mechanisms, and clear employment contracts need to be enforced. JBS supplier is required to prove compliance with South African labour laws and ILO standards, particularly regarding migrant labour protections.

How JBS plans to better Manage and Mitigate Modern Slavery Risks:

1. **Due Diligence & Transparency** – Requiring detailed *supply chain mapping* from suppliers, banning unauthorised subcontracting.
2. **Independent Audits & Worker Interviews** – Using SMETA 4-Pillar audits, AndWider worker surveys, and JBS direct factory visits to ensure compliance.
3. **Grievance Mechanisms & Worker Voice** – Implementing whistleblower hotlines and anonymous reporting channels for factory workers.
4. **Stronger JBS Supplier Contracts** (Updated in 2025) – JBS Mandating ethical sourcing clauses in supplier agreements, ensuring no recruitment fees are charged to workers.
5. **Exit Strategy for Extreme Risk Countries** – Considering phasing out Myanmar - due to ongoing forced labour concerns.

By applying these measures, JBS aims to further reduce the risk of modern slavery within our supply chain. We do this while upholding compliance with the Modern Slavery Act 2015 and ethical best practices.

JBS Effective Ethical Procurement Policy

External drivers

The following external drivers influence our organisation's choice to purchase abroad, or from a particular supplier:

- **Economic** – exchange rates, profit margin, duties, tariffs, insurance, the employment market and availability of resources. Sustainable innovation can lead to the creation of new market space for products and services.
- **Technological** – the ability to communicate real-time information enables developing country suppliers to compete effectively
- **Legislation** – social, technical, environmental and economic/competition
- **Social** – social consciousness, e.g. avoidance of worker exploitation, influences consumer behaviour and political activity. Increased worker satisfaction can improve productivity.
- **Environmental** – use of energy, re-useable, non-toxic materials, reduction of waste and processes to improve profit margins, reduction of carbon in supply chains, etc.

JBS Group Response to Ethical Procurement

Due to the business risk of unethical procurement practices, JBS Group has a **Code of Conduct** that sets out minimum standards and parameters for procurement, other than simply cost.

They include the following ways of working which:

- collect and provide all parties with the information they need to plan more effectively, (e.g. **share audit reports**)
- lead to efficient communications and formalised, streamlined buying and production processes.
- empower buyers to select and reward good practice and leadership of suppliers.
- encourage buyers and suppliers to collaborate with organisations who have expertise in addressing systematic problems within the supply chain.
- identify and address unacceptable practices like fraud, bribery and modern slavery.
- enable buyers to collaborate with others who are purchasing from the same supplier (where appropriate).

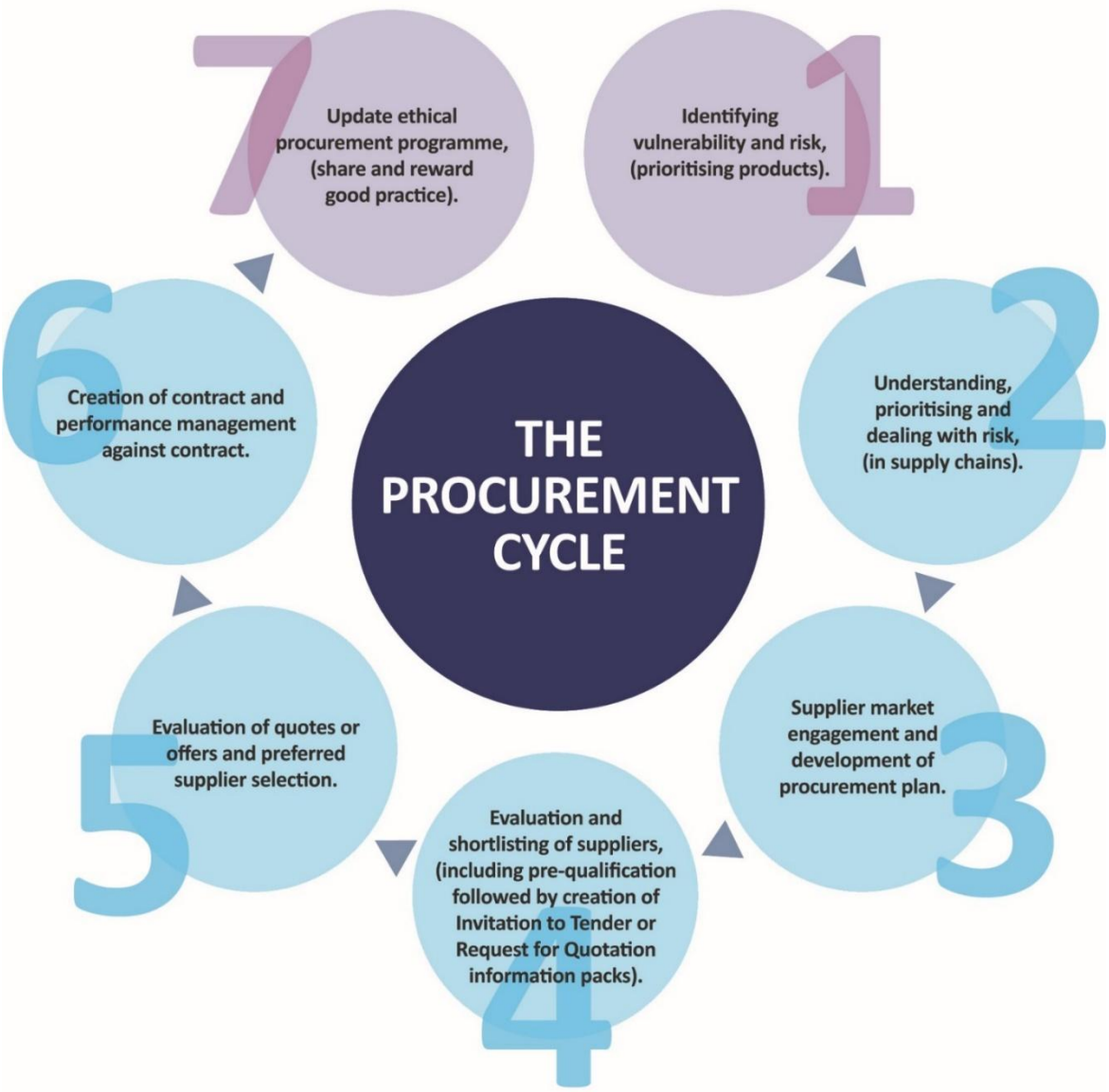
JBS Group recognises the ***shared responsibility for suppliers to implement good workplace practices*** and for buyers to select, enable and encourage good performance

by suppliers. Where bad performance is identified, especially where it concerns conduct that violates minimum standards, this should be addressed as a priority.

The JBS Procurement Cycle

The detailed JBS procurement cycle breaks down into seven major stages. The following section examines each of these stages, highlighting good practice and, specifically, what the JBS buyer should bear in mind.

- Stages 1 and 7 focus on the **ethical/responsible purchasing programme** covering all purchases
- Stages 2 – 6 are the stages a purchasing organisation goes through - in relation to each purchase



In brief:

Stage 1: JBS needs to **identify Risks, Threats and Vulnerabilities (RTVs) in its supply chain** - to be able to prioritise its actions to improve social and environmental impacts. We have a duty to undertake due diligence to spot & mitigate such Risks, Vulnerabilities or Threats (RVTs) that may arise.

Stage 2: Understanding, **prioritising and dealing with Risk**. If it is not already clear from the Code of Conduct and procurement policies, JBS procurement should work with our internal colleagues who requisition products, as well as other colleagues, to shape the technical, social and/or environmental criteria of the specification.

Stage 3: Supplier market engagement & development of procurement plan. **Engage with suppliers** - to assess who meets our desired standards. Assess the economic situation of the workers in the supply chain. JBS Procurement give feedback to internal colleagues on what the market is able to provide, and the implications of different sourcing approaches, including timings.

Stage 4: Evaluate and shortlist suppliers. During this stage, JBS buyers reinforce to suppliers the importance of environmental and social performance; they assess suppliers' willingness to meet & commit to ethical standards.

Stage 5: Evaluate quotes or offers and JBS Preferred Supplier selection. When JBS buyers assess pre-qualification questionnaires, tenders or audit reports from suppliers abroad, it is important to look for inter-related elements.

Stage 6: Create a **Buying Contract** and performance manage (SLAs) against that contract. The economic and business parameters which you negotiate then impact social responsibility - through a series of positive/negative consequences for the supplier +/or the environment. Our **Ethical procurement KPIs and sustainability targets should be included in the contract** as well as in the specification. Buyers need to assess supplier performance against the desired level of social or environmental performance, focusing on elements identified in corrective action plans or improvement initiatives recorded in the contract.

Stage 7: Update ethical procurement programme - including setting standards. Share and reward good practice. Identify root causes and barriers to improvement. Act to address root causes.

END