Jangro Modern Slavery & Human Trafficking Statement

1. Organisation

This statement is made on behalf of Jangro Limited, its subsidiaries and associate companies, pursuant to the section 54(1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement in respect of the financial year ending 31st December 2023.

2. Organisational Structure

2.1 Distribution Network

Jangro is the largest independent national distribution network of janitorial, catering and ancillary products in the United Kingdom and Ireland. With 47 distribution centres "**Members / Membership**" throughout the country, there are over 1500 employees in the UK.

Jangro performs the sale of the aforementioned goods through the Membership and via its website. Demand for our products is consistent throughout the year and is therefore not seasonal.

2.2 Structure

Board Members: The Organisation and its distributors, together defined as the "**Group**", is controlled by a Board of Directors. The Board consists of a chair person and six elected Jangro Members.
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Jangro Head Office: Administration for the group is handled via a Jangro Head office based in Bolton, Lancashire. Departments at Head Office include finance, procurement, sales, sustainability & innovations, marketing, IT, customer services and national accounts. Head Office is managed by our Chief Executive Officer.
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Jangro Committees: We have several committees: Procurement, Sales & Marketing, Innovations, Enviro and IT made up of representatives from the Membership. The focus of each committee is to further develop the Jangro Group whilst ensuring that any contracts and innovations meet our environmental and sustainability strategies.
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Jangro Group Membership: 46 distribution centres across the UK and Ireland. A breakdown of sites is listed in 2.3.

2.3 Jangro Member Locations

England

- Bedford
- Berkshire
- Billingham
- Bristol
- Cambridge
- Cornwall
- Cumbria
- Derby
- Devon
- Dorset
- East Sussex
- Egremont
- Essex
- Gloucester
- Grimsby
- Kent
- Leicester
- Liverpool
- London
- Macclesfield
- Middlesex
- Morecambe
- Norfolk
- Northampton
- Peterborough
- Redditch
- Sheffield
- Shropshire
- Southampton
- Surrey
- Swanley
- Watford
- West Yorkshire
- York

Ireland

- Belfast
- Co. Westmeath
- Cork
- Dublin

Isle of Man

- Douglas

Scotland

- Aberdeen
- Fife
- Glasgow
- Inverness
- Perthshire

Wales

- Caerphilly
- Pembrokeshire

3. Definitions

Jangro considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

4. Commitment

Jangro acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Jangro understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Jangro does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Jangro in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Jangro strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

5. Supply Chains & Potential Exposure

Jangro have a zero-tolerance approach to slavery and human trafficking, and we expect all of those in our supply chain to comply with our values. As part of our initiative to identify and mitigate risk, we have put various controls in place to ensure our systems are effective in safeguarding against any form of slavery or human trafficking:

Our supply chain includes around 100 tier 1 suppliers, predominantly UK based. However, as our supply chain network is varied and some manufacturers global, we understand that our first-tier suppliers are sometimes intermediary traders and therefore have further contractual relationships with lower-tier suppliers. We appreciate that this brings with it potential quality, compliance and CSR issues etc, and therefore we follow a strict due diligence process to ensure that we are asking the right questions of our supply chain by challenging and benchmarking against industry standards, regulations and according to our own policies and procedures which include: Corporate Responsibility Policy, Modern Slavery & Human Trafficking Statement, Supplier Quality System Audit, Environmental Policy, Equality & Diversity Statement, to name but a few.

In general, Jangro considers its exposure to slavery and human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods or services to us.

6. Steps

Jangro are committed to the highest standards of quality, integrity and fairness in its supplier dealings and in encouraging transparency throughout its supply chain.

6.1 Supply Chain Accountability

- **Supplier Selection & Code of Conduct**

Modern slavery compliance is an integral part of our due diligence for supplier prequalification and approval, driven by our Procurement Team.

Our tenders have a prequalification section on 'Standards & Regulations' covering supplier policies and procedures regarding Codes of Conduct, Social Values and Ethics, Governance Controls and Compliance to Regulations. These responses are scored as part of the process to decide who is short listed to ultimately become an Approved Supplier. Assessment of organisations corporate governance procedures are reviewed to assess the risk of them dealing with unscrupulous businesses.

Prior to onboarding, all new suppliers are required to complete our Quality Assessment and Sustainability (Social, Environmental and Economic) checklist which consists of a suite of questions designed to ensure that our organisations goals and aims are aligned. These drill down on ethical practices including ethical conduct, modern slavery, child labour, anti-bribery etc in the supplier's organisation, what their supply chain looks like and what they are doing to guarantee ethical sourcing. In addition, if a supplier is selected to become a key strategic partner, they are audited and measured by KPI's to ensure that they continue to demonstrate they are achieving our key business objectives and priorities.

- **Contractual Controls**

We have introduced strong contractual clauses into new and renewal supplier contracts to reinforce supply chain transparency. Suppliers are required to comply with the Modern Slavery Act 2015 and ensure relevant training of its staff; take all reasonable steps to ensure that modern slavery and human trafficking is not taking place in its business or supply chain, and ensure that sub-contractors are bound by the same terms. Evidence must be provided to us upon request and we have the contractual right to audit suppliers to ensure compliance of their obligations.

6.2 Employee Accountability and Reporting Mechanisms

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all Jangro employees. In the event that an employee becomes aware of an issue, we encourage the reporting of concerns through our whistleblowing policy where all employees are encouraged to report any concerns relating to unlawful conduct or any other matter which is deemed a "relevant failure" of Jangro.

6.3 Training

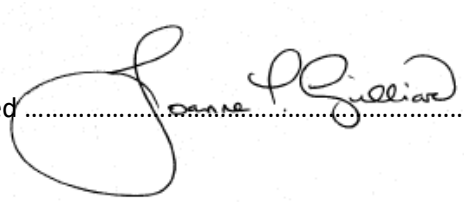
Jangro take training very seriously and our Procurement Team are members of CIPS, thus committing to promote the eradication of unethical business practices including undertaking due diligence on appropriate supplier relationships in relation to forced labour (modern slavery) and other human rights abuses, fraud and corruption.

We are also members of the Supply Chain Sustainability School through which we proactively provide specific training to our procurement team on relevant legislation and best practice on combatting modern slavery.

7. Slavery Compliance Officer

We have a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed and who will then undertake relevant action with regard to the Group's obligations in this regard.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for the financial year ending 31st December 2022, and outlines the steps we have taken as an organisation to assess our operations and supply chain and mitigate any risk of slavery and human trafficking.

Signed 

Joanne Gilliard, Chief Executive Officer