

## Slavery and Human Trafficking Statement

Financial Year ended 31 March 2019

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and describes the actions taken to ensure that our business and our supply chains are free from slavery and human trafficking.

### Our Business and Organisational Structure

JBW is a trusted collections and enforcement partner to UK Government and a market leading innovator in the recovery of unpaid road traffic penalties and council and commercial debt. We operate exclusively within the UK, primarily within the public sector market, providing enforcement agent, debt recovery, analytics and related services.

JBW is a subsidiary of Outsourcing UK Limited, which is wholly owned by Outsourcing Inc., an international company headquartered and quoted in Tokyo. The group specialises in business process outsourcing, transaction processing, data management, IT and business services, enforcement and debt recovery, and recruitment and resourcing.

### Our Policies

We have a comprehensive range of policies and operating procedures covering the recruitment, employment and conduct of employees and agents engaged in our business.

Our expectations are clearly documented in a Code of Conduct which applies to our staff and agents, who are supported by policies covering Equality and Diversity, providing clear Grievance procedures, ensuring Dignity at Work and means to facilitate Whistleblowing. All policies are available via our Intranet.

Our policies ensure that all staff and agents are treated fairly and equally and are paid in accordance with the law. Our employees are not contractually required to work more than 48 hours per week.

We are confident that the practices we adopt and the terms on which we employ, manage and organise our workforce are of a high standard and effectively safeguard against the exploitation, abuse or coercion of the people we directly employ.

### Our Supply Chain

We rely on suppliers to support our business, particularly in relation to recruitment, IT application software and services, office and facilities services and professional services from lawyers, accountants and other advisers.

Our supply chain consists of large, reputable suppliers of industry standard goods and services (themselves subject to section 54(1) of the Act), medium sized providers of specialist support services, and small, locally based suppliers of general services. All suppliers are UK based.

We have preferred suppliers across many parts of our supply chain and employees are encouraged to use them. Potential new supplier are subject to a process of due diligence which includes a financial assessment and confirmation of trade references.

We have a Supplier Code of Conduct for our suppliers to adopt, the requirements of which reflect our own internal standards and our Standard Supplier Terms and Conditions have been updated to reference the obligations of the Modern Slavery Act 2015.

We continue to believe that the composition of our supplier base and the nature of the goods and services we procure, lessen the risk that slavery or human trafficking is present within our supply chain.

## Training

We provide specific training to our employees in relation to Modern Slavery, and our policies appropriately reference the provisions of the Modern Slavery Act 2015. These policies are available to all employees via our intranet.

JBW Group Limited has adopted and supports the principles of the UN Global Compact (<https://www.unglobalcompact.org/what-is-gc/mission/principles>), we recognise the reality of human slavery and our responsibility, and the responsibility of our partners, to ensure the protection of human rights.

A handwritten signature in blue ink that reads 'Nick Tubbs'.

**Name of Director:** Nick Tubbs

Approved by the Board of Directors of JBW Group Limited

**Date:** July 2019