

MODERN SLAVERY STATEMENT

Summary – internal use only		
Statement Author	Policy Implementer	Policy Oversight and Responsibility
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Review Period	Effective From	
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Document Change History – internal use only			
Version	Date of Change	Description of Change	Location of Change
<u>V1</u>	<u>Reviewed 21.02.22</u>	<u>Dates revised to reflect current financial year</u>	<u>At the start of the statement</u>

MODERN SLAVERY STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's modern slavery and human trafficking statement during its current financial years 2020-2021.

James Hallam Limited Modern Slavery Act Statement

James Hallam Limited (JHL) is committed to ensuring modern slavery does not exist in the Company or supply chains. We constantly strive to develop policy and procedures to manage the way we obtain our goods and services to keep our supply chains robust. To date we have had no reports of modern slavery within the Company or within our supply chains.

Our Structure

JHL is regulated by the FCA and provides insurance broking services to commercial Companies, specialist insurance sectors and private individuals.

Supply chain

JHL continues to assess the modern slavery standards of our key suppliers as part of our internal contract process.

Staff wellbeing

JHL have a clear framework of rules and behaviours which encourages the reporting of any concerns or breaches so that they can be dealt with appropriately in accordance with our Company, HR policies and procedures.

We have reviewed our safeguarding procedures and framework to ensure we recognise, report and respond to all concerns or incidents of safeguarding. We are committed to keeping all our employees safe from harm and abuse.

We offer a confidential Whistleblowing procedure where staff can raise concerns confidentially if they wish. We also have an Employee Assistance Programme which provides staff with a secure way of seeking advice when required and in particular about any modern slavery or human trafficking issues personally affecting them, friends or their families.

Health and Safety

This statement sets out our approach to ensure we provide a healthy working environment for our staff and contractors that work out of our premises.

Recruitment

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

JHL conducts employment background checks on staff to confirm their eligibility to work in the UK.

Further steps

We intend to take the following further steps to combat slavery and human trafficking:

- ✓ Notify all existing suppliers of our expectations and their obligations in relation to the prohibition of modern slavery;
- ✓ Include appropriate measures in our due diligence processes for sourcing suppliers, subcontractors and acquisitions on a risk assessed basis;
- ✓ Provide training to relevant Group employees to ensure a high level understanding of the risks of modern slavery and human trafficking; and
- ✓ Where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement has been approved by the CEO *Paul Anscombe* and the JHL Board and signed on its behalf by *Andy Swann*, Company Secretary.