

Modern Slavery Policy

1. Policy Statement

- 1.1. Modern Slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2. PJH has a zero tolerance approach to modern slavery and we are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chain.
- 1.3. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents contractors, suppliers or any other people or bodies associated with the business.

2. Responsibility for the Policy

- 2.1. The Directors have overall responsibility for ensuring this policy complies with our legal obligations, and that those that are under our control comply also with it.
- 2.2. In relation to our supply chain The Directors are responsible for implementing this policy and monitoring its use and effectiveness, dealing with queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3. The Chief Financial Officer has primary and day to day responsibility in relation to those directly employed by us for implementing this policy and monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3. Compliance with the policy

- 3.1. All persons working for PJH must ensure they read, understand and comply with this policy.
- 3.2. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All persons working for PJH are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 3.3. All persons working for PJH are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier at the earliest possible stage, by reporting in accordance with our whistleblowing policy.

4. Communication and Awareness of this policy

- 4.1. This policy is communicated to employees.
- 4.2. PJH employees are required to communicate our zero tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforce our approach as appropriate thereafter.

5. Due diligence

- 5.1. In order to comply with our zero tolerance approach, we have systems in place to ensure that all employees and those in our supply chain implement this policy. These will be kept under review.

6. Breaches of this policy

- 6.1. Any breach of this policy will generally be treated as gross misconduct and may result in dismissal.
- 6.2. We will terminate our relationship with individuals and organisations working on our behalf if they do not comply with this policy.

7. Timeframe

- 7.1. This policy relates to financial year ended 31st December 2018.
- 7.2. This policy was approved by Directors on 21st March 2019.



Jason Shaw

Chief Financial Officer - 21.03.2019