



## JBR Recovery Ltd

### Modern Anti-Slavery & Human Trafficking Statement

#### 1. Modern Anti-Slavery and Human Trafficking Statement

##### 1.1 Introductory Scope

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015, Respect for human rights is one of the fundamental values of the corporate strategy behind JBR Recovery Ltd ("JBR") which dedicates particular attention to compliance with, & implementation of, principles & obligations enshrined in binding and voluntary, national & international laws and statements governing this subject matter.

JBR guarantees respect for universally recognised human rights & commits that all of its commercial partners comply with, observe & adopt the values shared by JBR.

##### 1.2 Anti-Slavery and Human Trafficking

JBR seeks to act ethically and with integrity in all business relationships. We recognise the importance in combating slavery and human trafficking and seek to ensure that there is no modern slavery or human trafficking in our direct supply chains or in any part of our business and to put in place systems and controls to safeguard against this.

##### 1.3 Processes to avoid Slavery and Human Trafficking

To identify and mitigate risk, JBR undertakes due diligence procedures on new and direct suppliers, which are designed to identify and mitigate risk. These procedures are considered to identify the owner(s) of the client or supplier and ensure that the requirements of the JBR Anti Money Laundering/Anti-Terrorist Financing Programme are followed in addition with JBR.'s Policies on Human Rights, Compliance and Ethics, Supply Chain Due Diligence and Modern Slavery and Human Trafficking Statement are shared with suppliers prior to any business being undertaken.

##### 1.4 Screening of Customers

For new customers screening tools are used as part of the customer due diligence process: existing customers are similarly screened periodically as well. The legal, compliance and customer onboarding teams are all involved in this process.

JBR as an associate member of the London Bullion Market Association (LBMA) is subject to Audits for Responsible Sourcing Programmes. These programmes are designed to combat systematic or

widespread abuses of human rights, to avoid contributing to conflict, to comply with high standards of Anti-Money Laundering and Combating Terrorist Financing practices.

## 1.5 Engaging with Suppliers

JBR has supplier due diligence requirements both at the outset and throughout a contract's term. These requirements have always considered the reputation risk of the activities being outsourced, or services being purchased, which includes compliance by the supplier with applicable laws and regulations. JBR has implemented a due diligence process when engaging suppliers and in relation to its on-going supplier relationships. Which includes seeking confirmation on compliance with slavery and human trafficking standards, as well as details of the steps that have been taken by the supplier in this respect.

## 1.6 Training and Capacity Building of Employees.

JBR has in place systems to protect whistle blowers. A supplement to the Supply Chain Due Diligence policy (available on <https://www.jbr.co.uk>) is the Whistle blowing Policy and Procedures which are designed as a control to help safeguard the integrity of JBR Supply Chains and Business dealings. This policy deals with reporting concerns related to financial reporting, suspected fraudulent activity, breaches of code of conduct and risks to the supply chain, breaches of the code of conduct and other compliance policies and retaliation or retribution against an individual who reports a concern. Employees are encouraged to report issues including human rights related concerns.

Relevant employees are required to undertake Mandatory learning program which includes courses on Anti-Money Laundering and integrity of supply chains.

JBR Policies and Statements may be viewed at <https://www.jbr.co.uk>

## 1.7 References

Universal declaration of human rights;

UK Modern Slavery Act 2015;

International Labour Organisation (ILO) Declaration on Fundamental Principles & Rights at Work & the main corresponding Conventions;

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected & High-Risk Areas & the Supplement on Gold, 2013;

LBMA Responsible Gold Guidance;

LBMA Responsible Silver Guidance.

The World Gold Council Conflict Free Gold Standard, 2012;

UN Guiding Principles on Business & Human Rights, 2011;

The Conflict-Free Sourcing Initiative: Five Practical Steps to Support SEC Conflict Minerals Disclosure, 2015;

FATF Recommendations;

The Extractive Industry Transparency Initiative 2016.



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