



JBR Recovery Ltd

**Modern Slavery Act
Transparency Statement
2018/19**

Modern Slavery and Human Trafficking Statement



JBR Recovery Ltd are committed to ensuring that it's staff and any workers it supplies (directly or indirectly) are not subject to behavior or threats that may amount to modern slavery, human trafficking, forced labour and similar human rights abuses.

We believe transparency is the best way we can ensure the that we are doing our best as an ethical corporate citizen. We are committed to ensuring our approach to tackling modern slavery in our business and throughout our supply chains is compliant and consistent with our obligations under section 54 of the Modern Slavery Act 2015.

This statement sets out JBR Recovery's actions to understand all potential modern slavery risks related to the business and to ensure all the legal requirements and steps are maintained to prevent both slavery and human trafficking within our business and supply chain.

JBR is a processor of materials containing silver, gold and other PGM metals, based in the UK. Our specialist skills have targeted secondary or waste materials, especially the photographic industry. Manufacturing processes and materials arising from partial refiners are our key sources of input material for treatment and refining. Where possible, we engage suppliers who have relationships with existing suppliers so that we can contain our supplier network and improve consistency in ethical practices throughout the supply chain.

JBR have embraced the requirement to publish an annual slavery and human trafficking statement. This will allow us to share our efforts against slavery and human trafficking and improve and measure our success each financial year.

Slavery and Human Trafficking Policies



Notably, we developed our Slavery and Human Trafficking Policy. The goals and objectives we have set, laid out below reflect our commitment to acting ethically and with integrity in all our business relationships:

- Relationships: Strengthening our supplier engagement process
- Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability
- Measurable change: Developing verifiable KPIs to measure progress
- Supplier collaboration: Encouraging suppliers to collaborate to address slavery and human trafficking issues
- Accountability: Establishing a framework for organization accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking

Due Diligence Procedures

We understand that our biggest exposure to Modern Slavery is in our supply chains. Within these areas, new suppliers and factories/sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and factories/sites. These audits assess compliance with the Global Sourcing Principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

Identifying, Assessing and Managing Risk



In order to assess the risk of modern slavery, we use the following processes:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains
- Review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.
- Protect whistle blowers.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Key Performance Indicators



In order to assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

- Staff training levels
- Number of slavery incidents reported in the supply chain

Training Available to Staff



To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking within our business our Modern Slavery policy is included in our Employee handbook.

We provide training to all members of staff and this has been incorporated into our induction programme.

