

Ethical Sourcing and Modern Slavery Policy

1. Overview

1.1. Purpose

This policy outlines JAG's commitment to ensuring that our operations and supply chains are free from modern slavery and unethical practices.

The policy also set out a framework for meeting reporting obligations set out in the [Modern Slavery Act 2018 \(Cth\) AU](#), and [Modern Slavery Act 2015 \(UK\)](#) including preparing and publishing an annual statement.

1.2. Scope

This policy is applicable to All JAG People, contractors, suppliers, and stakeholders involved in JAG's operations.

2. Policy Statement

2.1. Ethical Sourcing and Modern Slavery (ESMS) Standard for JAG Supply Change

JAG's suppliers are expected to adhere to the standards and practices set forth in the "Junior Adventures Group Supplier Code of Conduct." This ensures an appropriate level of assurance that the JAG supply chain is free from modern slavery and unethical practices. The document covers the following areas:

- Compliance with Law
- Social responsibility
- Environmental responsibility
- Integrity, ethics, and conduct
- Sub-Contracting
- Supply chain governance
- Reporting and Accountability
- Quality Assurance

2.2. ESMS Standard for JAG Operation

JAG implements internal controls to ensure that its operations are free from modern slavery and unethical practices. The focus areas are listed below:

2.2.1. Compliance with laws and regulations

All policies, processes, and procedures must comply with applicable labour law, human rights, health and safety, and environmental laws and regulations.

2.2.2. Business Integrity

Any form of bribery, corruption, or extortion, either direct or indirect, is prohibited.

2.2.3. Modern Slavery

Policies, processes, and procedures must comply with the Modern Slavery Act 2018 (Cth) (Australia), Modern Slavery Act 2015 (United Kingdom), and any other similar legislation in the jurisdictions in which JAG operates. Employees at all levels are expected not to engage in modern slavery practices.

2.2.4. Select Employment freely

Trafficked, forced, bonded, or involuntary labour is strictly prohibited, and workers must be allowed to leave employment freely after reasonable notice or as agreed upon.

2.2.5. Child Labour

JAG strictly adheres to applicable laws and labour standards regarding minimum working age.

2.2.6. Freedom of association and collective bargain

JAG respects workers' rights to join trade unions and engage in lawful activities such as collective bargaining.

2.2.7. Safe & hygienic working conditions

- Employees must be provided with a safe and healthy working environment.
- Employees must have access to clean toilet facilities and water, as well as appropriate facilities for food preparation and storage.
- Accommodation, when provided, must be clean, safe, and meet the basic needs of the employee.
- JAG will implement and maintain health and safety policies and procedures in their workplaces.

2.2.8. Wages and Benefits

- Payments must meet or exceed the minimum standards indicated by relevant laws and regulations.
- Employees must be given written and understandable information about their employment conditions, including details of their wages, prior to commencing work.
- Deductions from wages as disciplinary measures are not permitted.
- Any deductions not provided for by national law must be made only with the employee's expressed consent.
- JAG will comply with relevant local and national fair wage and minimum wage laws and regulations.

2.2.9. Working Hours

- Working hours must comply with all applicable laws and regulations.
- Overtime must not be excessive or demanded regularly and must be compensated at a rate in accordance with local laws and regulations.
- Employees must be provided with necessary rest breaks.
- Accurate records of hours worked by each employee must be maintained.

2.2.10. Discrimination

- JAG ensures compliance with applicable anti-discrimination laws in all employment practices.
- All employees must be treated with respect, fairness, and dignity.
- Employees must have access to grievance or complaint processes in cases of discrimination or harassment.

2.2.11. Regular Employment

- Work must be based on a recognised employment relationship established through national law and practice.

- JAG will not avoid obligations to employees under labour or social security laws through sub-contracting or other such arrangement.

2.2.12. Harsh or Inhumane treatment

- Physical abuse, the threat of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation are prohibited.
- Employees must have access to support and protection if they are subject to harsh or inhumane treatment, including bullying.

2.2.13. Environment

- Employees must comply with all applicable environmental laws and regulations.
- Mandatory environmental permits and licenses must be obtained and maintained.

2.2.14. Grievance Mechanisms & Remediations

- A grievance mechanism should be available for all employees to lodge complaints without fear of retaliation.
- All grievances must be kept confidential.

2.2.15. Privacy

All personal and sensitive information must be treated and protected in accordance with relevant privacy and confidentiality laws and regulations.

2.3. Raising Concerns

JAG encourages its employees and stakeholders to raise genuine concerns related to ethical sourcing and modern slavery in the workplace. The privacy of individuals raising these concerns will be protected to the extent permitted by law.

2.4. Non-Compliance & Reporting

JAG will engage suppliers who either comply with this policy or are taking verifiable steps towards compliance. Any known breach of this policy should be immediately reported to allow JAG to take appropriate actions.

There will be no victimisation of those who report non-frivolous actual or suspected breaches. If the policy is breached, JAG will act as expeditiously as possible to investigate the breach and mitigate its adverse impacts.

2.5. Policy Awareness

All employees who are directly involved in supply chain management, procurement, and other roles pertinent to the enforcement of this policy should be fully aware of the Modern Slavery and Ethical Sourcing Policy.

2.6. Modern Slavery Statement

JAG will prepare and submit an annual modern slavery statement in accordance with the requirements of the Modern Slavery Act 2018 (Cth) AU and the Modern Slavery Act 2015 (UK)

2.7. Safeguarding Children and Young People

Safeguarding Children and Young People is an integral part of our commitment to ethical sourcing and modern slavery prevention, In accordance with JAG's Modern Slavery commitment to assess and monitor our supply chains, we are committed to ensuring they are free from child labour and exploitation while upholding ethical standards and human rights.

3. Key Terms

Term	Definition
Modern slavery	Refers to a range of serious human rights violations that are also crimes including: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.
Supplier	Means any individual, company or other legal entity that sells products or services to Junior Adventures Group.
JAG	Junior Adventures Group and its controlled entities
ESMS	Ethical Sourcing and Modern Slavery
JAG People	Any adult that governs, manages, conducts work for, or provides activities and/or services to, JAG in a paid or unpaid activity spanning all levels of the organisational structure

4. References

Regulations and Frameworks
The United Nation Guiding Principles on Business and Human Rights
The Ethical Trading Initiative (ETI) Base Code
The Modern Slavery Act 2018 (Cth) AU
The Modern Slavery Act 2015 UK
Related Policies
JAG 1.0 Whistleblower Policy
JAG 2.0 Safeguarding Children and Young People
JAG 3.0 Professional Code of Conduct
SD 1.2 Diversity, Gender Equity and Inclusion
Related Procedures
PCPPR003 Grievance
Other
Junior Adventures Group Supplier Code Of Conduct

<i>Version</i>	1.0
<i>Change History</i>	JAG Policy Change Register
<i>Date Approved</i>	15/12/2023
<i>Date Implemented</i>	15/12/2023
<i>Document Owner</i>	Babak Rowshan
<i>Document Approvers</i>	Group CEO
<i>Next Review</i>	24 months