

The JGA Group

Modern Slavery Statement and Policy

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At The JGA Group we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2020.

Our business and subcontractors

The JGA Group is engaged in training including apprenticeships, vocational qualifications and provision of Information Advice and Guidance. Our business is in the United Kingdom.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our subcontractor selection and on-boarding procedure includes due diligence of the subcontractor's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our subcontractors, but if we were, then we would act immediately against the subcontractor and report it to the authorities.

Risk assessment

In the past year, we conducted a risk assessment of our subcontractors by taking into account:

- All subcontractors are based in the UK
- The business services rendered by the subcontractors
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Policies

The JGA Group operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and subcontractors to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistleblowers.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the

business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our subcontractors.

Subcontractor due diligence

The JGA Group conducts due diligence on all new subcontractors during on-boarding and on existing subcontractors at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the subcontractors, and their health and safety standards and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning subcontractors that fail to improve their performance in line with our requirements

We require all subcontractors to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment
-

Awareness

The JGA Group has raised awareness of modern slavery issues by sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

In addition to the awareness programme, The JGA Group offers training to those employees on induction and annually through inhouse CPD.

This statement covers 1 October 2020 to 3 September 2021 and has been approved by the Academic Board of The JGA Group.



1 October 2021

Next review October 2022