# Modern Slavery Statement

#### Introduction

The Modern Slavery Act 2015 requires large commercial organisations operating in the UK to publish a slavery and human trafficking statement setting out the steps they have taken to ensure their business and supply chains are free from modern slavery. Although Just Digital is not required under the Act to publish a statement we wish to put on record our commitment to the principles of the Act.

This statement sets down Just Digital's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

#### **About Just Digital's structure and business**

Just Digital operates as a supplier of design and print on demand services in mass customisation sectors, principally operating in the United Kingdom. Based in the United Kingdom, Just Digital employs over 200 people. Just Digital has an annual turnover of over £13 million.

In order to provide our printing, graphic design and marketing services, we work with a range of suppliers. The majority of our suppliers (99%) operate in the UK and EU and all but a few are UK registered companies. Most of our suppliers are larger companies with their own robust supply chain and Modern Slavery policies in place; several of our suppliers are members of Sedex.

#### **Policies**

As a responsible business and as part of our commitment to combating modern slavery, we have formulated and implemented the following policies:

- Equality and Diversity Policy
- Recruitment Policy
- Ethical Purchasing Policy

Our policies have been developed by our Corporate Legal team and are signed off by members of the senior leadership team. We endeavour to make every effort to make our suppliers aware of our policies and to adhere to the same standards we uphold.

#### **Due diligence**

Given the nature of our suppliers, we consider the risk of slavery or human trafficking to be low, but we continually assess this. We are a member of Sedex and are FSC and PEFC certified thus ensuring that appropriate human rights protection are in place with regard to our most significant materials supply, paper.

A director and senior member of the management team is in charge of ESG matters including Modern Slavery. Any issues identified will be addressed by our Corporate Legal Team.

During 2023 and 2024 we are planning to introduce formal vendor risk assessments and supplier questionnaires as well as introducing formal supplier audits.



#### **Training**

We regularly carry out training on a range of compliance matters and make our staff aware of our policies in our induction training.

#### **People**

The great majority of our staff are directly employed by us. Our recruitment processes are fair and transparent, and we are able to make appropriate checks to confirm the identities of new staff, carry out right to work check and to ensure their salary is paid into their personal bank account. We are a Living Wage accredited employer.

#### **Further actions**

During the remainder of 2023 and into 2024 we intend to:

- Develop and implement a formal vendor risk assessment questionnaire and process, as well as an audit process
- Continue to evaluate the risk of slavery and human trafficking in our new suppliers
- Increase internal staff training and awareness of our policies and our obligations to prevent slavery and human trafficking.

This statement was reviewed and approved by the Board of Directors on 26 October 2023

Andy Grundy (Nov 1, 2023 08:42 GMT)

Andy Grundy Just Digital Limited Date: 26 October 2023



## Modern Slavery Statement v2.0

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