
Modern Slavery Statement 2024

J.S. Held LLC and its affiliates and subsidiaries (“J.S. Held”) are committed to protecting human rights by preventing modern slavery and human trafficking in our business activities with our service providers. We are a value-driven organization with a zero-tolerance attitude towards slavery and trafficking of any kind. We expect our stakeholders, including our service providers and suppliers, to comply with our values and to have appropriate policies and procedures in place to ensure that slavery and human trafficking do not exist as part of any operations.

Our Business

J.S. Held is a global consulting firm specializing in technical, scientific, financial, and strategic advisory services. Our professionals operate across continents, assisting clients in navigating complex challenges and mitigating risks. We acknowledge the potential for modern slavery within our global network and are steadfast in our commitment to upholding the highest ethical standards throughout our operations and supply chains.

Our Policies

J.S. Held has a zero-tolerance policy towards modern slavery and human trafficking. We are dedicated to ensuring that our operations and supply chains are free from any form of exploitation. We have implemented the following policies to prevent modern slavery and human trafficking:

- **Third Party Code of Conduct:** We require all our service providers and suppliers to adhere to our Third Party Code of Conduct, which includes stringent provisions related to the prevention of modern slavery and human trafficking.
- **Whistleblowing Policy:** Our Whistleblowing Policy empowers employees and stakeholders to report any concerns related to modern slavery or human trafficking confidentially and without fear of retaliation.
- **Labor & Human Rights Policy:** Our Labor & Human Rights Policy outlines our commitment to respecting and promoting the fundamental rights of workers throughout our operations and supply chains. It covers areas such as fair wages, working hours, health and safety, and non-discrimination.

Due Diligence Process

We conduct rigorous due diligence on our suppliers, including audits and questionnaires. We also collaborate with third-party organizations to enhance our risk assessment capabilities. Our third-party contracts include clauses that mandate compliance with all applicable laws including labor laws and human rights standards.

Risk Assessments & Management

We are cognizant that certain sectors and geographical regions within our global operations and supply chains may carry an inherent risk of modern slavery. To proactively address these challenges, we implement a comprehensive risk management approach that includes:

- **Risk Mapping:** We regularly conduct risk assessments to pinpoint areas within our operations and supply chains susceptible to modern slavery. This involves evaluating factors such as geographical location, industry sector, and labor practices.
- **Targeted Due Diligence:** We employ enhanced due diligence measures for high-risk suppliers and regions, including audits, independent third-party verification, and ongoing monitoring.
- **Collaborative Engagement:** We actively engage with suppliers, industry associations, and NGOs to promote transparency, share best practices, and collectively combat modern slavery risks.

Performance Evaluation

We measure and analyze a range of key performance indicators (KPIs) to ensure we are combating modern slavery. These KPIs include:

- **Supplier Audits:** We conduct regular audits of our suppliers to assess their compliance with our Third-Party Code of Conduct and identify any potential risks or violations.
- **Whistleblower Reports:** We actively encourage and track reports made through our whistleblower hotline, ensuring they are thoroughly investigated and addressed.
- **Training Completion Rates:** We monitor the participation and completion rates of our awareness training programs to ensure our employees are equipped to identify and report potential concerns.
- **Grievance Mechanisms:** We maintain accessible grievance mechanisms for workers within our supply chains to voice concerns or report any instances of exploitation.

Through continuous monitoring and analysis of these KPIs, we identify areas for improvement and implement corrective actions. Recent initiatives include:

- **Enhanced Supplier Due Diligence:** We have strengthened our supplier due diligence processes, incorporating additional risk assessments.
- **Targeted Training Programs:** We have developed specialized training modules for high-risk areas within our supply chains.

Training and Awareness

We provide comprehensive training to our employees on modern slavery awareness, including its various forms and indicators. Our training programs equip our staff with the knowledge and tools to identify and report any potential instances of exploitation within our operations or supply chains.

Future Steps

We are committed to continuously improving our practices to combat modern slavery and human trafficking. In the year ahead, we will continue to implement best practice relating to combatting human trafficking and modern slavery across the business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes on behalf of J.S. Held LLC on slavery and human trafficking statement for the finance year ending 2024.

Approval

This statement was approved by the Board of Directors of J.S. Held. It is published annually on our company website and is readily available to all stakeholders.

Signed,



Scott Katcher
Chief Legal Officer
September 30, 2024