

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

The Jar – Healthy Vending is fully aware of the responsibility it bears toward its customers, employees, and suppliers. As such we have given ourselves a strict set of ethical values to guide us in our business dealings.

We take social and environmental factors into consideration alongside economic factors in making decisions on the purchase of goods from our suppliers. Our purchasing decisions consider the products whole life cost and the associated risks. The Jar – Healthy Vending has never made a purchasing decision based solely on cost. Social and environmental factors make a significant impact to our aim of ethical procurement, by minimising any risk of social abuse within the supply chain.

The Jar – Healthy Vending is of the belief that this not only makes commercial sense, but it also has the potential to improve the living and working standards of people around the world. This policy sets out the detailed requirements and minimum expectations of our policy of ethical procurement. This policy addresses the expectation that our staff and suppliers have an innate respect for our ethical standards and that relationships with our suppliers are always based on the principle of fair and honest dealings. The principle of fair and honest dealings is extended to all others with whom our suppliers do business, including employees, sub-contractors and other third parties and their local communities.

## 1. Objectives

### Compliance

The Jar Healthy Vending's compliance objective is to adhere to the principles laid out in The ETI Base Code.

### Ethical Procurement

The Jar – Healthy Vending's ethical objective is to ensure that people in the supply-chain are treated with respect and have the following rights regarding their employment.

- Equal opportunities
- The right to freely choose employment
- Working hours that comply with national laws
- The freedom of association
- Payment of a living wage
- Recognised employment rights
- Recognised safe and healthy working environment

## Sustainable Procurement

The Jar – Healthy Vending’s sustainability objective is to ensure a continued acceptance of the need for procurement decisions to be made on delivering ethical trading.

### 2. Commitments

#### Legal compliance

We expect our suppliers to comply with all laws applicable to its business. The supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice.

#### Right to a living wage

We expect our suppliers to comply with the respective national laws and regulations regarding working hours, wages, and benefits. Wages should not be paid in kind and should be enough to meet the basic needs of the workers. All workers should be provided with written and comprehensible information about their employment conditions in respect to wages before they start employment. Deductions from wages as a disciplinary measure should not be permitted. Deductions from wages covered under national law should only be allowed with the agreed permission of the worker concerned. Any disputes regarding wages should be recorded.

#### Environmental responsibility

We expect our suppliers to consider their impact on the environment, have a responsible attitude towards environmental issues and to strive towards improving their impact on global pollution.

#### Employment

We expect our suppliers to not use forced, bonded or involuntary prison labour. All employees have the right to join or form trade unions of their own choosing and, where a significant proportion of the workforce agree, to bargain collectively. Employees’ representatives are not discriminated against and have access to carry out their representative functions in the workplace.

#### Avoidance of excessive working hours

Standard working hours must comply with national laws and national industry standards. All employees should not on a regular basis be required to work more than 48 hours per week and should be provided with at least one day off for every 7-

day period on average. Overtime requested by the employer must be voluntary and must not be requested on a regular basis.

### Elimination of child labour

The supplier employs no children under the age of employment.

### Provision of regular employment

We expect our suppliers to meet obligations to employees under labour or social security laws and regulations arising from the regular employment relationship should not be avoided. Suppliers should where possible avoid labour-only contracting, fixed-term contracts, sub-contracting, or apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

### Elimination of Discrimination

We expect our suppliers to have a policy covering equality and there should be no grounds to discriminate when hiring, compensation, access to training, promotion, termination, or retirement based on race, religion, age, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.

### Worker ill-treatment

We expect our suppliers to not use physical abuse or other harassment or verbal abuse with their workers.

### No Bribery

Bribes shall not be accepted or offered, under any circumstances, or for any reason. The Jar – Healthy Vending recognises that bribery is a criminal offence in the UK and shall comply with the Bribery Act 2010, no matter where in the world the act of bribery takes place. Any acts of bribery by those working for The Jar – Healthy Vending, or on our behalf may result in a prosecution in the UK.

### Modern Slavery Policy

Modern slavery is a crime and a violation of our human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

As a small business we are not legally required to publish any statement, we have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers, and other business partners. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

After a simple analysis of our purchasing practices, we can confirm that we have no critical control points and that if we do identify any how, we mitigate them.

We do not do and do not support any of the items listed below:

- Aggressive pricing that does not consider sustainable production costs
- Short lead times
- Late high-volume orders
- Inaccurate forecasting Late or extended payments
- Withdrawn from contracts last minute
- Unfair penalties for not meeting orders despite last minute changes
- Inaccurate technical specifications

### 3. Sustainable Procurement

#### Monitoring and measuring

The Jar – Healthy Vending will ensure our suppliers meet the ethical targets in this document, and we will seek to assist them in meeting their identified targets. The procedure we have in place to cover the investigation process is we send our leading suppliers an SAQ (Self-Assessment Questionnaire) asking them about their labour standards. In addition, to identify at-risk areas within suppliers' supply chains, we map your supply chain and do a risk evaluation against each supplier in terms of the potential risk per country of origin.

#### Working in partnership

The Jar – Healthy Vending will seek out suppliers that share our commitment to high ethical standards. We will offer assistance to our suppliers in raising their ability to meet their social accountability targets. We will develop partnerships with our suppliers and work together to minimise the social impacts of our supply chain.

#### Procurement process

The Jar – Healthy Vending will attempt to influence and encourage suppliers to create a more reliable marketplace for ethically produced products. Social factors are and will continue to be considered a key part of the purchasing process.

Specifically, this includes considering where the product is made, by whom and whether the organisation complies with local laws and regulations.

#### 4. Safety and Health Working Conditions

The Jar – Healthy Vending expects our suppliers to provide a safe and healthy working environment which is regulated to international standards and the prevailing knowledge of the industry. The Jar – Healthy Vending expects our suppliers to put in place preventative action to prevent accidents, injury to health and minimise the causes of hazards inherent in the working practice and environment.

The Jar – Healthy Vending expects our suppliers to provide workers with suitable and sufficient health and safety training, so they are fully aware of the hazards associated with the work environment and the correct practices required to minimise the risks.

The Jar – Healthy Vending expects our suppliers to provide suitable and adequate welfare facilities including toilet facilities, drinking water and food storage where required. The Jar – Healthy Vending expects our suppliers to assign a senior management representative responsibility for health and safety.

#### 5. Best Practice Principles

##### Making a difference

The Jar – Healthy Vending expects our suppliers to focus attention on those parts of the supply chain where the risk of not meeting these requirements is highest and where the maximum difference can be made. The Jar – Healthy Vending's suppliers should be prepared to demonstrate the basis of their approach regarding the above.

##### Awareness raising and training

The Jar – Healthy Vending currently expects our suppliers to ensure that all necessary people are provided with appropriate training and guidelines to implement the requirements of this policy.

##### Working together and Improvements

The Jar – Healthy Vending will work collaboratively with suppliers in implementing this policy. Our aim is to identify suppliers that fall below this policy and work with them to ensure compliance within an agreed timeframe. The Jar – Healthy Vending will not do business with a supplier where serious conflicts with our policy are identified and where the supplier consistently fails to take corrective action within an agreed timescale.

##### Independent verification

The Jar – Healthy Vending recognises that the implementation of this policy may at times be assessed through independent verification. We will expect our suppliers to provide reasonable access to all relevant information, premises, and workers and co-operate in any assessment against our policy. There is an expectation that the supplier will ensure that subcontractors do the same.

## 6. Responsibility of Implementation

Responsibility for the achievement of this policy and our objectives rests with the Director.

The Director is responsible for reviewing the policy and ensuring that it is kept up to date with changes in legislation.

## 7. Whistleblowing

Our responsibility as an ethical and compliant supplier is to recognise the importance of staff raising safeguarding issues or other such concerns which are in the public interest commonly referred to as whistleblowing. Whistleblowing is the act of reporting concerns about malpractice, wrongdoing or fraud and is something we take extremely serious at The Jar – Healthy Vending. When raising issues these should be shared with the appointed person at the company, who could be an immediate manager or a person of more seniority. We expect our suppliers to offer their workers an appointed person to contact in the event of whistleblowing. At The Jar – Healthy Vending the person in overall charge of allegations of malpractice, wrongdoing or fraud is Iurii Loichenko, CEO. We shall receive and respond to allegations, complaints or other alerts about labour standards issues as part of our whistle blowing procedures. All communications received in relation to whistleblowing will be stored securely, investigated, and then responded to. The necessary confidentiality and sensitivity will be applied to all such reports.

The following guidelines are available to workers when raising concerns:

- Identify the following code/guidance/policy or protocol you believe is being compromised.
- Be specific about the issues you are worried about and focus on the facts.
- Set out what you feel should be done as well as highlighting the problem.
- Express yourself in a professional manner, written notes are a good method of clarifying thoughts.
- Wherever possible raise concerns with the support of colleagues.
- Keep a note of all relevant conversations and keep copies of any communication sent or received.

## 8. Evidence of Compliance

### External Monitoring

The Jar – Healthy Vending will obtain and commit to third party certification against a nationally or internationally recognised standard, such as the membership at FDF of UK.

### Internal Monitoring

The The Jar – Healthy Vending Management Team will carry out regular monitoring of the implementation of ethical standards to enable us to ensure that ethical and social factors are considered in the procurement decisions.

### 9. Targets

To demonstrate compliance with this policy standard and objectives, The Jar – Healthy Vending will introduce and maintain achievable targets. Ethical targets are set to provide evidence of our commitment to our social responsibility.

- Encourage Ethical Procurement as a core factor in the purchasing process
- Educate all staff members in their responsibility surrounding ethical procurement
- Provide a platform that encourages open communication with suppliers to ensure compliance with this document
- Top 5 suppliers have ethical policies in place or return a signed Ethical Procurement Questionnaire.

### 10. Partnerships

We are partnered with the following organisations and continue to look for further partnerships that will enhance our due diligence:

#### Living Wage Employer

In 2023, The Jar – Healthy Vending achieved accreditation as a Living Wage Employer. By providing fair wages, they prioritized their employees' well-being and set an example for the industry. This commitment fostered a supportive work environment, increased productivity, and showcased their strong moral values in the evolving landscape of 2023.

