

John Pye & Sons Limited – Modern Slavery Statement

As a leading responsible auction house John Pye & Sons Limited (JPS) is totally committed to the aims of eradicating the risks of modern slavery in our business and in our supply chain. This statement describes what action we will take to address these risks during the financial year from August 2022 to July 2023. We have zero-tolerance towards slavery and require our supply chain to comply with our values. We will set and uphold robust standards on worker welfare and protection and ensure that our operations and supply chain adhere to them effectively, supporting them wherever we can.

1. Organisation structure

JPS is a UK Headquartered, family-owned business founded in 1968 with its registered Head Office in Nottingham. It operates from multiple locations throughout the United Kingdom as auctioneers and valuers with over 960,000 sq. ft of indoor auction rooms and premises in England, Northern Ireland, Scotland and Wales. The company employs over 650 staff from these locations. JPS recently announced plans to expand across Europe, with Spain set to be the first location overseas. The move will see the business acquire a 151,771 sq ft site in Zaragoza and will create 80 additional jobs.

JPS is recognised as the leading auctioneer for consumable goods and is instructed to sell circa 400,000 items every week on behalf of retailers, government bodies, the insolvency industry, shippers and PLCs.

The company is committed to conducting business in an ethical and environmentally responsible way and this statement is made on behalf of the directors of JPS and pursuant to the requirements of section 54 (1) of the UK Modern Slavery Act 2015.

2. JPS Supply Chain

JPS works with a range of suppliers. We have 2 levels of suppliers, those that are strategic to our business; and those with whom we work on an ad-hoc basis. Our supply chain includes transport, office supplies, infrastructure, and equipment maintenance. Across our sites, we also work with a number of agencies supplying temporary workers typically as auction porters. These agency workers support our core directly employed workforce during seasonal periods of peak production or to cover short term labour shortages. The agencies that we work with are all reputable national or international organisations and we rely on them to undertake adequate checks to ensure that the labour provided does not pose a risk of modern slavery.

Procurement and supply chain management is a key issue and is overseen by our Commercial and Finance Teams. We monitor supply chain performance and have processes in place to review and assess performance via feedback from clients and employees and undertake audits annually. Suppliers commit to adhere to all legislative issues as they apply in each area of our operations across the UK and we reserve the right to terminate the contract at any time should any instances of modern slavery come to light.

3. Policies in relation to slavery and human trafficking

We have the following Policies in place to support and enable us to identify risks of Modern Slavery incidents:

- Modern Slavery and Human Trafficking Policy
- Whistleblowing Policy
- Grievance Policy
- Bullying and Harassment Policy
- Equal Opportunities Policy

We are committed to ensuring that we offer equality of employment throughout the various locations in which we do business. Through our policies we set clear parameters for how we expect our employees to interact with colleagues, suppliers and clients.

4. Due diligence processes

As part of JPS' efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we complete regular Internal Supplier Audits.

Our due diligence procedures aim to:

- Identify and monitor potential risks of slavery and human trafficking occurring in our business and supply chains. We do this in our business by:
 - a) Carrying out robust right to work checks in line with Government guidelines
 - b) Requesting bank account details in the name of the employee
 - c) Carrying out DBS checks also assists in quantifying employee addresses
- Highlight action to be taken to remove or reduce potential risks in our business and supply chains

In addition to asking our supply chains to commit to adhering to all legislative issues and to our company's policies and practices, we ask suppliers to provide us with a copy of their own Modern Slavery statement and policies where applicable. If non-compliance is identified among suppliers, we take action to investigate and resolve concerns by working proactively with them

5. Risk assessment and management

The company has assessed the nature and extent of its exposure to the risk of slavery and human trafficking occurring in the UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping

If we discover evidence of failure by any of our suppliers to comply with our values, we will seek to terminate our relationship with that supplier immediately.

6. Key performance indicators to measure effectiveness of steps being taken

JPS uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place within its business and supply chains.

Below is a summary of our KPIs which include new commitments we are making for the coming year. These will help us continue to promote awareness about this important issue within the company.

- Include modern slavery as an agenda item in director meetings at least annually.
- Our induction with all new staff to include awareness of modern slavery issues and our policy regarding it.

- Explore how we can strengthen our processes to so that modern slavery criteria are more routinely applied in our supply chain where relevant.

7. Training on modern slavery and trafficking

In addition to our Modern Slavery and Human Trafficking Policy we have a Modern Slavery learning module for senior management. All Site and Department heads have been trained in Modern Slavery and understand the signs to look for in the wider workforce.

Additionally all new employees are taken through a Modern Slavery Awareness presentation as part of their induction.

We have an awareness campaign across our workforce and issue bi-annual reminders on our online 'Workplace' platform, the subject also forms part of our 'ToolBox Talk' portfolio.

Following a review of our training procedures, we intend to take the following steps:

- To educate our employees and promote awareness of our Modern Slavery and Human Trafficking Policy
- To review our policies in line with Government guidance, making changes where necessary
- Ensure that our suppliers and customers are aware of our policies



Zoe Wright
Director
6th July 2023