

Anti-Modern Slavery Statement

Ethical Commitment

The JT Group (“JTG”) is opposed to slavery and human trafficking and is committed to making meaningful improvements to sustainable workplace conditions and business practices including, but not limited to, the prevention of forced or trafficked labour. Through modifying our own operations and encouraging our suppliers to do so, we consider the social, environmental and financial impact of our business throughout our supply chain. We are joining our industry peers in global initiatives that drive corporate responsibility throughout the telecommunications industry.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”) and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2020. It sets out the steps JTG has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Our Business

JTG is wholly owned by the Government of Jersey, we have over 130 years' experience in the telecommunications industry. With more than 2.5 million active SIMs worldwide, over 3,000 business customers and 7 locations globally, we are dedicated to delivering a world-class service.

Our Supply Chains and Due Diligence Processes

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our working practices reflect our commitment to acting ethically and with integrity in all our business relationships and to maintaining effective systems to ensure forced labour or trafficking is not taking place anywhere in our supply chains.

Sustainability and Risk Assessment

We have a sustainability strategy which was launched in the first quarter of 2021 (and replaced JT's CSR policy) to ensure that our business is conducted according to rigorous ethical, moral, professional and legal standards. As part of our supply chain on-boarding process we carry out specific due diligence as well as 'Know Your Client' and credit checks and audits to ensure compliance with this policy, as well as including contractual terms to ensure that the requisite safeguards are in place and our chosen suppliers meet the criteria set out in our sustainability strategy policy.

JTG has a programme to ensure all suppliers are subjected to an initial risk assessment. Each supplier is rated low, medium or high risk, taking into account the country in which they are based, the business relationship that is being established, credit and other background checks as well as our personal knowledge of their business. As a high-risk industry, we have a particular focus on the manufacturing side of the business where our handsets and SIM cards are put together. We endeavour to carry out rigorous checks with our high-risk suppliers, completing due diligence reports to ensure our suppliers adhere to our standards. Senior members of our teams will meet with our suppliers to discuss any concerns that are raised

and ensure these are addressed without delay. No issues were identified in 2020 and as such this process has not been hampered due to Covid travel restrictions.

JTG has been working hard to improve its procurement policies and processes generally which include improvements to the risk assessment of suppliers from an Anti-Modern Slavery perspective.

As part of our due diligence, a self-assessment questionnaire was developed and sent for completion to all suppliers which JTG regards as high risk from an Anti-Modern Slavery perspective. This self-assessment questionnaire (“SAQ”) is designed to:

- support the identification of modern slavery risks;
- foster collaborative efforts between JTG suppliers and ourselves to address these risks;
- improve transparency; and
- identify areas for further due diligence.

Addressing modern slavery risks is a business-critical issue, as not only is it the right thing to do, it will also improve the integrity and quality of our business operations and supply chains. We will actively review and follow through on the responses and any risks identified during 2020.

Our Training

We take our corporate social responsibility and ethics extremely seriously. We understand that training is a fundamental way to raise awareness and to effectively implement the organisation’s commitment to fair working practices. During 2020, we undertook a mandatory programme of training to ensure that our staff are aware of our stance on modern slavery and are committed to ensuring that all business operations are conducted to the highest ethical standards.



Graeme Millar
Chief Executive Officer