

# Modern Slavery and Human Trafficking Statement

## Purpose

The purpose of this statement is to outline how JetBlack Plumbers (JB) identifies, manages, and mitigates the risk of modern slavery across our operations and supply chains. JB is committed to operating responsibly and to upholding the highest ethical standards.

## Our Commitment

We recognise that modern slavery can take many forms, including forced labour, servitude, human trafficking, debt bondage, child labour, forced marriage, and deceptive recruiting. JB has a zero-tolerance approach to any form of slavery or human trafficking and is committed to protecting the rights of all people connected to our business, including employees, contractors, suppliers, customers, and communities in which we operate.

## About Us

Since 2018, JB has grown into a respected national plumbing company providing commercial plumbing installations, service, and maintenance. With our people and workplace culture underpinned by core values, our vision is to be the world's most customer-focused plumbers. Respecting and improving human rights is fundamental to how we deliver services for our employees, customers, and the broader community.

## Our Approach

JB embeds anti-slavery practices into our compliance framework, operations, and supplier engagement. Key elements include:

- **Risk Assessment:** Identify business areas and supply chains at highest risk of modern slavery.
- **Supplier Engagement:** Work with suppliers to understand their anti-slavery measures and promote transparency.
- **Contractual Safeguards:** Include explicit prohibitions against slavery, servitude, forced or trafficked labour, and child labour in supplier agreements.
- **Monitoring & Continuous Improvement:** Regularly review processes, maintain an improvement register, and address gaps or opportunities.
- **Awareness & Training:** Provide modern slavery awareness training for relevant staff and key suppliers.

## Principles of the Code of Practice

JB adheres strictly to the following principles to ensure ethical treatment of all workers:

1. **Forced or Involuntary Labour:** All work is voluntary; no forced, bonded, or indentured labour.
2. **Workplace Equality:** All workers treated fairly and equally, including migrant workers, without threats or coercion.
3. **Recruitment Fees:** Workers are not charged for recruitment, travel, or visa processing.
4. **Wages and Benefits:** Workers receive at least legal minimum wages and benefits; no wage deductions as punishment.
5. **Document Retention:** Workers retain control over identity and travel documents; confiscation is prohibited.



6. **Working Hours:** Hours comply with national law; overtime is voluntary and fairly compensated.
7. **Contracts of Employment:** Written contracts in a language understood by the worker; no substitution of less favourable terms.
8. **Freedom of Movement:** Workers' movement is not unreasonably restricted; no mandatory employer-provided residence.
9. **Health and Safety:** Safe and healthy workplaces in compliance with all applicable regulations.
10. **Grievance Procedures:** Workers can raise concerns without fear of retaliation.
11. **Humane Treatment:** Workplaces are free from inhumane treatment, harassment, or abuse.
12. **Private Employment and Labour Recruiters:** Agencies used for recruitment operate legally, ethically, and without risk of forced labour.

#### **Future Commitment**

JB will continue to monitor and improve practices, engage with stakeholders, and ensure that our business and supply chains remain free from exploitation.



CEO  
Karla Kirch

**Date:** January 2026

**Next Review Date:** January 2027