## John Pye & Sons Limited – Modern Slavery Statement

As a leading responsible auction house John Pye & Sons Limited (JPS) is totally committed to eradicating the risks of modern slavery in our business and in our supply chain. This statement policy describes what action we have taken to address these potential risks during the financial year from August 2024 – July 2025. We have zero-tolerance towards slavery and expect 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 and 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, Scotland and mainland Spain. The company employs over 600 staff from these locations.

JPS is recognised as the leading auctioneer for consumable goods and is instructed to sell circa 40,000 items every week on behalf of retailers, government bodies, the insolvency industry, and PLCs.

JPS 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 two 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 delivery, transport, packaging, infrastructure, and equipment maintenance. Across our sites, we also work with several agencies supplying temporary workers, typically as auction porters. These agency workers support our core, directly employed, workforce during seasonal periods of peak activity 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 expose JPS to the risk of engaging labour contrary to modern slavery law.

Procurement and supply chain management is a key issue and is overseen by our Finance, SHEQ and Legal Teams, which conduct checks on all suppliers and contractors that JPS engages with. We also monitor supply chain performance and have processes in place to review and assess performance via feedback from clients and employees and undertake audits throughout the year. We expect suppliers to commit to adhere to all relevant legislation applicable in each area of our operations across the UK, and where possible 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 and request the completion of supplier questionnaires which contain specific questions relating to Modern Slavery.

- Internally, and to reduce the risk of modern slavery and human trafficking occurring in our own workforce, we implement the following processes -
  a) Creating awareness amongst our managers through regular e-learning exercises.
  b) Encouraging wider participation amongst employees with poster campaigns showing how to react to any suspicious behaviours
  c) Carrying out robust right to work checks in line with Government guidelines, prior to recruitment
  d) Ensuring bank account details in the name of the employee
  e) Carrying out DBS checks on all employees, this also assists in verifying 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 chain partners to commit to adhering to all legislation and to JPS' policies and practices, where applicable we ask suppliers to provide us with a copy of their own Modern Slavery statement and policies. If non-compliance with modern slavery legislation or policies is identified among suppliers, we take action to investigate and either resolve concerns by working proactively with them, or by removing such businesses from our supply chain.

## 5. Risk assessment and management

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

- Evaluating the modern slavery and human trafficking risks of each new supplier
- Reviewing suppliers own modern slavery policies to ensure they are aligned with our own policies
- 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 as soon as practicably possible.

## 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 for all new staff will include awareness of the issue of modern slavery and our policy regarding it.
- Develop our processes 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 provided with Modern Slavery Training 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 including biannual poster campaigns to raise awareness and reporting responsibilities. We also include Modern Slavery in our portfolio of 'Toolbox Talks'.

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
- Learn from situations where modern slavery risks have been uncovered so that, where possible, our processes and policies are improved and are stress-tested.

Bruce Burton
Director
16 December 2025