

Modern Slavery & Human Trafficking Statement

This report was approved by the Board of Directors of JHF Limited, in April 2025 in compliance with section 11(4)(b)(ii) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 and section 54 of the UK Modern Slavery Act 2015.



Introduction

This statement is made under section 54 of the UK Modern Slavery Act 2015 (MSA) and similar legislation to outline JHF Limited UK's focus on the identification and prevention of modern slavery and human trafficking within our business and supply chains.

JHF Limited UK is a subsidiary of Centurio Holdings Limited (wholly owned subsidiary of Spinneys 1961 Holding PLC, a company registered in DIFC, United Arab Emirates ("the Group"). The Group is principally engaged in the operation of supermarkets in United Arab Emirates, Sultanate of Oman and Saudi Arabia.

The principal activity of the Company is to be supporting the growth of the Group supermarkets operations in the United Arab Emirates and the Oman region by supplying foodstuff and non-food groceries items in accordance with their requirements. The Company is not a wholesale business but a vertically integrated procurement business, directly linked to the Group retail business.

JHF Limited UK employees 53 employees. In addition to our UK office, the Group has subsidiaries in the USA and Australia.

This statement sets out a high-level summary of the activity within the Group to protect people from these risks.

We acknowledge the evolving nature and patterns of modern slavery and human trafficking and will continue to review our policies and processes to ensure they are fit for purpose. Throughout 2024 and beyond, we will continue to assess the risks within our business and supply chain, refine our approach to addressing modern slavery, and consistently monitor and report our progress.

Policies

JHF Limited UK's zero-tolerance approach to modern slavery is outlined in the Group's Anti-Slavery and Human Trafficking Policy (the 'Policy'). This Policy applies to all persons working for us or on our behalf and is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and is also available on our website.

1.Encouraging Vigilance: We actively encourage all employees to promptly raise any concerns or suspicions regarding modern slavery within any part of our business or supply chains, regardless of the supplier tier.

2.Reporting Suspected Breaches: If any employee believes or suspects that a breach of our modern slavery policy has occurred or may occur, they are required to inform their manager as soon as possible.

3.Clarifying Uncertainties: Employees who are uncertain whether a specific act, the general treatment of workers, or their working conditions within any tier of our supply chains constitutes modern slavery are encouraged to discuss their concerns with their manager.

4. Fostering Openness and Support: We strive to foster an environment of openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring that no one suffers any adverse treatment as a result of reporting their suspicion that modern slavery, in any form, is or may be occurring within any part of our business or supply chains.

By implementing these measures, we aim to create a transparent and supportive workplace where the risks of modern slavery are continuously assessed, and our approach to tackling it is consistently refined and monitored.

Focus Areas

At JHF Limited UK, we are committed to ensuring that modern slavery & human trafficking do not occur within our business operations or supply chains. We recognize the significant risks associated with these issues and are dedicated to implementing measures to mitigate them.

Sourcing of Raw Materials: We source a variety of food items globally, including fruits, vegetables, and meat. The initial stages of harvesting or extracting these raw materials can be vulnerable to forced labour, especially in regions with weak labour laws.

Manufacturing Processes: The transformation of raw materials into finished products involves complex supply chains. This stage can be susceptible to labour exploitation, particularly in countries where oversight is minimal.

Shipping and Distribution: The logistics involved in transporting goods from suppliers to consumers can pose risks. Workers in shipping and distribution may face poor working conditions and low wages, increasing the likelihood of exploitation.

Third-Party Suppliers: We work with a network of suppliers to source our products. Ensuring that these suppliers adhere to ethical labour practices is crucial. Suppliers in countries with high rates of trafficking and forced labour are particularly risky.

Non-Food Items: We also deal with non-food grocery provisions. The production of these items, such as packaging materials, can involve labour exploitation, especially in industries known for poor labour practices.

Our Commitment:

To address these risks, JHF Limited UK is committed to:

- Conducting thorough audits of our supply chains.
- Implementing strict supplier codes of conduct.
- Engaging in continuous monitoring and reporting.
- Collaborating with organizations dedicated to combating modern slavery.

Monitoring the supply chain – priorities

JHF Limited UK has over 300 suppliers, and goods and services sourced by the company come from all parts of the world. JHF Limited UK is committed to procuring goods and services from suppliers who demonstrate ethical principles in the way they conduct their business. We expect our suppliers to provide a fair, safe and healthy environment for their workforce.

In addition to a rigorous procurement process when suppliers are selected and onboarded JHF Limited UK is working to ensure that:

- i. all suppliers are aware of our policies and standards and commit to adhere to them.
- ii. there is full and regular mapping of our supply chain, not just where the majority of spend is located.
- iii. there is an effective and dynamic way of identifying high risk suppliers, looking at the industry in question and the location where the work it is carried out and using information and intelligence from reliable international sources.
- iv. there is a focus on unregulated and manual activities, where the risk relating to temporary and casual labour may be more prevalent.
- v. the risk assessment extends to industries that have complex and lengthy supply chains, so that these areas can be given further scrutiny and analysis.
- vi. a collaborative approach is taken with all internal and external stakeholders to identify and mitigate risks, using our leverage as a customer for services and goods.
- vii. we have an effective system for complaints and issues to be raised and discovered for investigation, for remediation and for tracking and recording trends across our supply chain.

Next steps

We will continue with and strengthen our ongoing commitment to tackling modern slavery and human trafficking and to address broader human rights issues.

During 2025 and beyond we plan to:

- Continue to develop our approach for tackling Modern Slavery at all levels within our supply chains, particularly in high-risk areas.
- Provide targeted Modern Slavery awareness materials for all Procurement staff and other employees who work with suppliers and continue to build capacity and culture of respecting human rights.
- Ensure that all new supplier contracts and those coming up for renewal contain Modern Slavery clauses and that our suppliers continue to promote it within their supply chains.
- Ensure that our suppliers have effective plans and procedures for monitoring and address risks within their own supply chains and improve the tracking and management systems, the remedies process and grievance access for workers.
- Continue the awareness campaign and updating of staff onboarding manuals on procedures for identifying potential cases of human trafficking in JHF Limited.