

A photograph of a jackfruit orchard. A wooden ladder is positioned in the center, reaching up into the dense canopy of green leaves. Several large, green, bumpy jackfruits are hanging from the branches. The scene is brightly lit, suggesting a sunny day.

**MODERN SLAVERY  
ACT 2015  
STATEMENT 2021**

A white circular logo containing the text 'JACK & JERRY' in a bold, black, stylized font. The letters are thick and blocky, with a slightly irregular, hand-drawn appearance. The logo is centered in the lower half of the page, overlapping the ladder and the lower part of the orchard.

**JACK &  
JERRY**



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When I set out in 2018 to create a plant-based pepperoni, I wanted to choose a main ingredient that could really be of benefit to people. Not only to those that may enjoy it's flavour, texture, nutrition and positive environmental factors. I was thinking about all the people who directly and indirectly would play a part in bringing this amazing wholefood – the jackfruit – to everyone's table.

In 2019, I met our first investor Claire Smith of Beyond Impact, and Jennifer Pardoe (now Jack & Bry's Co-founder and COO). Both had my vision, as well as the capability and motivation to join me in being the actors and guardians of a purpose-led people-focused, safe and sustainable business.

We started trading in September of 2019, and with new backing from more investors, we can now describe, build and implement practices to prevent Modern Slavery throughout our supply chain and beyond, as part of our wider ESG practices. While we feel we are at the start of our journey, and while we know it won't be perfect, we feel the responsibility to act (and not just talk about it). Our first step has been to identify both risks and high ethical standards - to lead the way in our chosen supply chain - so that the people helping us are free from human rights abusers.

BRYONY TINN-DISBURY  
Founder & CEO  
06.01.21

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015.

COVER IMAGE: Jack & Bry Founder's jackfruit farm visit 2019 Vietnam



# OUR BUSINESS

Jack & Bry Ltd is a female founder-led company based in the UK. The company is owned by the founders as well as impact investors, private equity and high net worth individuals. We sell a wide range of jackfruit-based products to UK customers and also export to the EU and UAE, for both B2B and retail products. We also sell retail products direct to consumers via our website [jackandbry.com](http://jackandbry.com) and operate a delivery-only kitchen where we purchase food ingredients, packaging and equipment for.

## OUR PURPOSE

Our overriding purpose is to provide our customers with safe and better plant-based meats made from jackfruit, while ensuring we do this with financial, environmental and social sustainability, responsibility and leadership across our supply chain, and with our team in the UK.

## OUR FUTURE

We are at the early stages of setting up the formalization of risk identification for modern slavery, and a timeline of actions. In the coming 3-6 months we are committed to actions that implement:

- Timeline (Board sign-off)
- Learn from NGOs providing frameworks
- Risk Assessments
- Due Diligence
- Monitoring & auditing
- Engage appropriate partners
- Look to our peers in the sector, research case studies and monitor risks
- Implement Key Performance Indicators (KPI's) to measure effectiveness

The above set up will be formulated and actioned by our executive team.

We recognize the abhorrent nature of Modern Slavery. The Jack & Bry Board is responsible for providing assurance to customers and stakeholders on what we are doing to address modern slavery as a standard part of conducting business as we grow.

8

UK  
employees

7

UK partners  
inc freelancers,  
SME's and  
consultants

1

Delivery  
Kitchen

2

Female  
Founders

21

Ingredients  
Suppliers

2

Co-  
manufacturers

24

Investors

2

DTC partners

# TIMELINE 2021

Beyond our own research of case studies, gleaning insights from peers, and site visits to supply chain partners, we identify the risk in working alone. In 2021 we will also engage with external partners who specialise in 'on-the-ground' support, so that we can strive to keep workers safe from exploitation. Our timeline for 2021 sets out our ongoing responsibilities, commitments and expectations.



# OUR POLICIES



Modern Slavery is present in many parts of the world, including the UK and our supply chain countries of origin. As a business we are committed to ensuring that we have practices and procedures in place in our supply chain to assess and mitigate risks, highlight and prevent unethical practices.

Our Policy is guided by the Ethical Trading Initiatives (ETI) Base Code. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognized code of good labour practice. As a minimum, we expect our suppliers to work towards compliance with ETI Base Code and their own country's employment laws.

### Internal Prevention Practices:

We have established internal policies to ensure that all our employees are treated fairly. Our Recruitment and Employment Principles are focused on equal treatment without discrimination and with the protection of employment law for all employees.

All employees working for Jack & Bry on a permanent or temporary basis have been subject to a right to work check as per UK legislation requirements. We do not hold or retain original passports, identity documents or residency papers. We provide written statements of terms and conditions of employment to all employees as required by law. These documents set out working conditions and expectations in a clear and transparent way. All employees are paid regularly, in accordance with their terms and conditions. We provide a written summary of pay and deductions via pay slip on every occasion.

- 1. Employment is freely chosen
- 2. Freedom of association and the right to collective bargaining are respected
- 3. Working conditions are safe and hygienic
- 4. Child labour shall not be used
- 5. Living wages are paid
- 6. Working hours are not excessive
- 7. No discrimination is practised
- 8. Regular employment is provided
- 9. No harsh or inhumane treatment is allowed

[https://www.ethicaltrade.org/sites/default/files/shared\\_resources/ETI%20Base%20Code%20%28English%29\\_0.pdf](https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Base%20Code%20%28English%29_0.pdf)

# OUR POLICIES

## **Internal Prevention Practices:**

We provide safe and decent working conditions with suitable training as necessary. Our operations comply with or exceed statutory health & safety standards.

We provide formal grievance provisions through which staff are free to lodge a work-related complaint or raise a matter of concern.

We provide a safe route for potentially affected staff to call anonymously to report issues.

We will constantly strive to create a productive environment, representative of and responsive to different cultures and groups, where everyone has an equal chance to succeed. Jack & Bry is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

## **Supplier Prevention Practices:**

It is important to be aware of labour practices in our supply chains and the need to monitor, evaluate and action information about our suppliers' performance. As a minimum, we expect our suppliers to work towards compliance with the ETI Base Code and the local law.

Our Purchasing, Technical and Supply Chain teams are leading initiatives with our suppliers to ensure we have a good understanding of policies and reinforcement of correct ethical practices.

As a minimum we expect our suppliers to be Sedex registered as part of our procurement due diligence.



Jack & Bry is committed to providing a working environment free from harassment and bullying and ensuring all employees are treated, and treat others with dignity and respect.

# RISK ASSESSMENT & DUE DILIGENCE

Risks are identified in priority of the most common, or have the most negative impact within the supply chain. We use the United Nations Guiding Principles on Business and Human Rights (UNGPs) to guide us in identifying them.

## **The responsibility to respect human rights requires that Jack & Bry Ltd:**

1. Avoids causing or contributing to adverse human rights impacts through our own activities and address such impacts when they occur.
2. Seek to prevent or mitigate human rights impacts that are directly linked to our operations and products, by our business relationships, even if we have not contributed to those impacts.

Jack & Bry sources ingredients and packaging from the UK and overseas. The jackfruit supply chain is typically fixed, with farms characterized by small allotments owned by multigenerational families who rely on local farm workers to harvest fruit in season. The fruit co-manufacturer sources directly from the allotment owner. The supply chain beyond our fruit processor partner is identified as medium risk due to the limited structure of formal employment between allotment owner and fruit harvesters. This is why we require our partners to be Sedex registered. This is a high focus area of assessment in our supply chain.

The Sedex self-assessment questionnaire enables us to identify site-specific risks of non-compliance. We combine this with a country-level view via insights from NGO's and peers, and in the future we will engage 'on the ground' support.

We have identified the need for a robust process to ensure Modern Slavery prevention procedures are in place with our partner suppliers. Our supply chain team ensures that a programme is in place to assess the risk in the supply chain base to prevent issues, and action when issues arise. Through our risk assessment and supplier management we can monitor and review compliance with our suppliers.

# GOVERNANCE

Guided by the ETI Base Code, implementing due diligence as described by the UN Guiding Principles on Business and Human Rights is the main core responsibility Jack & Bry Board seeks to adhere to. In 2021 we will partner with the Slave Free Alliance to support our supplier due diligence and go beyond the requirements of the Modern Slavery Act.

Governance of human rights in the Jack & Bry supply chain forms part of the company's wider Environmental and Social governance. As part of the Executive team, Clive Sharpe (non-executive chairperson, investor), sets the strategic direction for Ethics and Sustainability, including Human Rights. The agreed strategy is overseen by the Partnership Board, including Bryony Tinn-Disbury (CEO). Jennifer Pardoe (COO) is accountable for Human Rights in the supply chain and responsible sourcing.

The Board is responsible for strategic direction of good practice in:

- Risk Assessing
- Addressing Business model or sector specific conditions
- Engaging with appropriate external partners for guidance and auditing
- Involving works in finding solutions
- Long-term partnership-based relationships with suppliers
- Effective monitoring, including farm auditing criteria and frequency of visits
- Corrective action and remediation
- KPI's focused on Impact rather than activity
- Communication and transparency

