

# Anti-Slavery and Human Trafficking Policy

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## 1. Policy statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 2. Responsibility for the policy

2.1 The high management has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 HR manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

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2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR manager.

### 3. Compliance with the policy

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or HR manager.

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

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#### **4. Communication and awareness of this policy**

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **5. Breaches of this policy**

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

in Bardejov, 17<sup>th</sup> of April 2018

Approved by:

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Janette Jarvie  
managing director

## Slavery and human trafficking statement

### Introduction from the board

This statement is made on behalf of the board of 2J Antennas, s.r.o. with regards to the Modern Slavery Act 2015 which requires large employers to be transparent about their efforts to eradicate Slavery and Human Trafficking in their supply chain.

### Our business

2J Antennas, s.r.o has established itself as a market leader within the antenna industry. Common applications such as automotive, M2M, base station and embedded antennas are well catered for, a range of marine antennas are imminent, while we also have full capability to develop customized products for any enclosure, mounting location or system desired by our customers. Besides antennas for most telecommunication applications our product catalogue offers also wide range of connectors and cable assemblies.

### Our supply chains

2J Antennas, s.r.o to date supply antennas across the entire globe, with loyal customers on each of the 5 major continents. Our base, in the new central Europe is furnished with the majority of equipment and highly skilled personnel that allows us to be largely self-sufficient. Plastic injections, SMD pick and place, product assembly and quality control are all carried out on the main site without a need for costly outsourcing. A new onsite anechoic chamber has been put in place to better our already broad design and testing abilities.

### Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and in so far as is possible to requiring our suppliers hold similar ethos. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

### Due diligence processes for slavery and human trafficking

As a part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier.

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Imported goods from sources from outside the UK and EU are potentially more at risk to slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

### **Training**

The company Directors and management shall take responsibility to implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organization.

### **Further steps**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business we intend to look to develop a specific policy for inclusion in our existing business policies and to share this with our supply chain and impress upon our supply chain the need to adopt a similar policy.

The policy statement will be reviewed annually and published. The policy takes into account and supports, the policies, procedures and requirements documented in our Integrated Management System. The implementation and operation of the management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company and that is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

in Bardejov, 17<sup>th</sup> of April 2018

Approved by:

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Janette Jarvie  
managing director