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JKX OIL & GAS LIMITED modern slavery statement summary (2022)

▶ [Organisation address](#)

We asked the organisation a series of questions about its modern slavery statement. Its answers are published on this page as a statement summary.

▶ [What is a modern slavery statement?](#)

Link to full statement

[Go to full modern slavery statement on organisation's website](#)

PDF version of the statement (optional)

THERE IS NO PDF VERSION OF THIS STATEMENT.

PDF statements were first introduced to the registry for the 2023 statement year.

About this statement summary

All answers relate to the financial year covered by the statement. The organisation is responsible for all the information it provided. Some of our questions are optional, so organisations may not have answered all of them. The statement summary does not replace the full modern slavery statement – below we provide a link to the full statement on the organisation's website.

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Statement period and sign-off details

The statement covers the following period:
1 January 2021 to 1 January 2022

The statement was signed off by:
Victor Gladden (CEO)

It was approved by the board (or equivalent management body) on:
1 January 2022

Recommended areas covered by the statement

Government guidance encourages organisations to cover a range of areas in their modern slavery statements, setting out the steps they're taking to address modern slavery risks in their operations and supply chains. [Read about the recommended areas in the statutory guidance.](#)

We asked the organisation to tell us which areas its statement covers.

Areas recommended by government guidance

Organisation's response

The organisation's structure, business and supply chains

COVERED

Policies

COVERED

Risk assessment

COVERED

Due diligence (steps to address risk)

COVERED

Training about modern slavery

COVERED

Goals and key performance indicators (KPIs) to measure the effectiveness of the organisation's actions and progress over time

COVERED

The organisation's sectors and turnover

Sectors

The organisation operates in the following sectors:

- Utilities: gas, water and electricity

Turnover

Its turnover in the financial accounting year of this statement was:

£36 million to £60 million

If the organisation is a public body, this amount is based on the organisation's budget for the year of the statement.

▶ [What does 'turnover' refer to in group statements?](#)

Number of years producing statements

The organisation has been producing modern slavery statements for the following number of years:

1 to 5 years

▶ [How does this work for group statements?](#)

Policies (optional)

We asked the organisation whether its policies include the following provisions in relation to its domestic and international supply chains, as well as its own operations.

Policy provisions we asked about	Organisation's response
Freedom of workers to terminate employment	INCLUDED
Freedom of movement	INCLUDED
Freedom of association	INCLUDED
Prohibits any threat of violence, harassment and intimidation	INCLUDED
Prohibits the use of worker-paid recruitment fees	INCLUDED
Prohibits compulsory overtime	INCLUDED
Prohibits child labour	INCLUDED
Prohibits discrimination	INCLUDED
Prohibits confiscation of workers' original identification documents	INCLUDED
Provides access to remedy, compensation and justice for victims of modern slavery	INCLUDED
Other	-

Training (optional)

We asked the organisation whether it provided training on modern slavery, and who it was for.

▶ [What counts as training?](#)

We asked who the training was for	Organisation's response
Your whole organisation	YES
Your front line staff	NO
Human resources	NO
Executive-level staff	NO
Procurement staff	NO
Your suppliers	YES
The wider community	NO
Other	-

Monitoring working conditions (optional)

Engaging with others

We asked the organisation to tell us who it engaged with to help monitor working conditions across its operations and supply chains.

We asked who the organisation engaged with	Organisation's response
Your suppliers	YES
Trade unions or worker representative groups	YES
Civil society organisations	NO
Professional auditors	YES
Workers within your organisation	YES
Workers within your supply chain	YES
Central or local government	YES
Law enforcement, such as police, GLAA and other local labour market inspectorates	NO
Businesses in your industry or sector	NO

Social audits

We asked the organisation to tell us about any social audits it used to look for signs of modern slavery.

▶ [What are social audits?](#)

Social audits we asked about	Organisation's response
Audit conducted by your staff	YES
Third party audit arranged by your organisation	YES
Audit conducted by your supplier's staff	NO
Third party audit arranged by your supplier	YES
Announced audit	YES
Unannounced audit	YES

Grievance mechanisms

We asked the organisation how workers in its operations or supply chains could raise concerns or make complaints.

We asked if workers could raise concerns this way	Organisation's response
Using anonymous whistleblowing services, such as a helpline or mobile phone app	YES
Through trade unions or other worker representative groups	YES

Other ways of monitoring working conditions

We asked the organisation whether it had any other ways of monitoring working conditions across its operations and supply chains:

Local council checks

Modern slavery risks (optional)



Identifying modern slavery risks is a vital step towards eradicating it. The government encourages organisations to be as open and transparent as possible, to improve understanding, collaboration and best practice around tackling this worldwide problem.

We asked the organisation to describe up to 3 priority risks it focused on during the period of the statement, including details of the affected workers, the activity involved, and the location.

Priority risks for this organisation (1 of 3)

Lack of company labour, environmental, community and security commitments

Questions we asked about this risk **Organisation's response**

Where it was most likely to occur Organisation's response: Within your supply chains.

- Tier 2 suppliers
Provide products and services to your organisation via your Tier 1 suppliers.
- Tier 3 suppliers and below
Provide products and services to your organisation via your Tier 2 suppliers or the next higher level in the chain.

Who was it most likely to affect Organisation's response:

- Women
- Migrants
- Refugees

In which country Organisation's response: Russia

Actions or plans to address this risk Organisation's response: Identify source of information relating to social and economic rights. Check that procedures have been followed, the reports may signal what type of Issues/rights were important to the company. These reports also provide insights into what has been identified and managed on human rights issues . Particular challenges in the contractors market in country, contracting details, monitoring of contractors/suppliers with regard to human rights issues, government constraints (corruption).

Priority risks for this organisation (2 of 3)

Lack of contractor & partner labour, environmental, community and security commitments

Questions we asked about this risk **Organisation's response**

Where it was most likely to occur Organisation's response: Within your supply chains.

- Tier 1 suppliers
Provide their products and services directly to your organisation.
- Tier 2 suppliers
Provide products and services to your organisation via your Tier 1 suppliers.
- Tier 3 suppliers and below
Provide products and services to your organisation via your Tier 2 suppliers or the next higher level in the chain.

Who was it most likely to affect Organisation's response:

- Women
- Migrants
- Refugees

Questions we asked about this risk

Organisation's response

In which country

Organisation's response: Russia

Actions or plans to address this risk

Organisation's response: Ensure Stakeholder engagement approach. Company to address the frequent complaints/grievances. Ensure grievance procedure. Also consultation mechanism, prior consent. Engagement of Land owners, marginal groups, indigenous groups identified and consulted with.

Priority risks for this organisation (3 of 3)

Inadequate or lacking ESIA's or other assessments commission by the company with respect to social or environmental impacts, security, threat assessments (security), labour rights issues

Questions we asked about this risk

Organisation's response

Where it was most likely to occur

Organisation's response: Within your supply chains.

- Tier 1 suppliers
Provide their products and services directly to your organisation.
- Tier 2 suppliers
Provide products and services to your organisation via your Tier 1 suppliers.
- Tier 3 suppliers and below
Provide products and services to your organisation via your Tier 2 suppliers or the next higher level in the chain.

Who was it most likely to affect

Organisation's response:

- Women
- Migrants
- Refugees

In which country

Organisation's response: Russia

Actions or plans to address this risk

Organisation's response: Identify source of information relating to social and economic rights. Check that procedures have been followed, the reports may signal what type of Issues/rights were important to the company. These reports also provide insights into what has been identified and managed on human rights issues. Particular challenges in the contractors market in country, contracting details, monitoring of contractors/suppliers with regard to human rights issues, government constraints (corruption).

Indicators of forced labour (optional)

We asked the organisation whether its statement refers to finding any International Labour Organization (ILO) indicators of forced labour.

► [What are ILO indicators of forced labour?](#)

ILO indicators we asked about	Organisation's response
Abuse of vulnerability	YES
Deception	YES
Restriction of movement	YES
Isolation	YES
Physical and sexual violence	YES
Intimidation and threats	YES
Retention of identity documents	YES
Withholding of wages	YES
Debt bondage	YES
Abusive working and living conditions	YES
Excessive overtime	YES
Other	-

Actions taken in response to finding ILO indicators

We asked the organisation to tell us whether its statement refers to any actions it took after finding indicators of forced labour

Organisation's response

THE ORGANISATION TOLD US ITS STATEMENT DOES NOT REFER TO ACTIONS IT TOOK AFTER FINDING INDICATORS OF FORCED LABOUR.

Demonstrating progress (optional)

We asked the organisation how its statement demonstrates progress over time in addressing modern slavery risks. They provided the following answer:

By accepting purchase orders from JKX, each Supplier will agree to be bound by our Code of Conduct. The Code requires Suppliers to certify compliance with the laws regarding Slavery and human trafficking of the country or countries in which they are doing business. Any supplier that is rated medium or high risk from the initial risk screen should then progress to a more detailed risk assessment. This is often done through a self-assessment questionnaire, which is sent to suppliers to complete.



