



## Modern Slavery Act 2015 Compliance Statement

### Introduction

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement of JSM Group.

JSM Group is committed to always conducting its business to the highest legal and ethical standards and is dedicated to preventing acts of modern slavery and human trafficking from occurring within its business and supply chains, including subcontractors.

This statement sets out the steps we have taken to prevent modern slavery and human trafficking happening in our business and supply chain since our last statement and outlines the measures we are putting in place to continue to reduce the risk of this happening in the year ahead.

### Responsibility

The Head of Procurement and Head of Human Resources have responsibility for the implementation of policy and raising awareness within the business for preventing modern slavery and human trafficking.

### Organisation's Structure and Supply Chains

JSM Group is a utilities service provider specialising in the delivery of integrated power, communications, and gas solutions. We have around 280 employees and operate in the United Kingdom with our core operations covering London and the Southeast, our core employees are supplemented with sub-contractors and workers. Future business growth will take our business into Europe.

### Policies

JSM Group has several policies which are designed to manage the risks relating to modern slavery and human trafficking issues. These include our Corporate Social Responsibility Policy, Ethical Purchasing Policy, Whistleblowing Policy, Anti-Bribery and Right to Work Policy.

Our Corporate Social Responsibility Policy is committed to encouraging our business partners to strive for the same high standards we adhere to and to act in a socially responsible way.

Our Ethical Purchasing Policy seeks to purchase goods and services that are produced and delivered under labour conditions that meet the Ethical Trade Initiative's (ETI) base code and therefore, do not involve the abuse or exploitation of any person.

Our Whistleblowing Policy is designed to enable employees to confidentially disclose concerns of malpractice or impropriety at a high level internally.

These policies reinforce our 'zero tolerance' approach to modern slavery and human trafficking occurring in our business and supply chain.



## Reporting

Should an individual have concerns regarding modern slavery or trafficking, they should make use of the Company's Whistleblowing Policy, or the external advice line contained therein. Information is also available on the GLAA helpline 0800 432 0804 and modern slavery helpline on 0800 0121700.

The reporting of concerns will be taken seriously and be promptly investigated.

## Risk and Due Diligence

We recognise that the construction and utilities sectors have risks relating to modern slavery and human trafficking. We acknowledge that these risks could occur within our own workforce and supply chain. To mitigate the risk of this happening in our own workforce, we carry out the following due diligence measures:

Pre-employment checks including the right work as part of our recruitment process as well as ensuring that each employee has their own bank account to reduce the risk of modern slavery and human trafficking.

We carry out due diligence during our subcontractor onboarding process through our 'Subcontractor Questionnaire' with audits undertaken on a risk-based approach. We also regularly review the Modern Slavery and Human Trafficking statements for our supply chain.

Awareness training and materials are provided to managers and employees, which includes how to recognise and report forced labour.

Where non-compliance is found, we work with our suppliers to become compliant, by issuing action plans and providing guidance. However, JSM Group will seek alternative suppliers where there is no willingness to address the situation within a reasonable period.

### Action Taken in the previous 12 months:

- Signed up to the Gangmasters Labour Abuse Authority (GLAA).
- Rolled out a modern slavery questionnaire to our supply chain.
- Audited the supply chain's modern slavery provision.
- Embedded in the procurement preferred supplier process that modern slavery policies must be in place and copies submitted with tenders.
- Distributed awareness material through our own business.



## Next Steps

Internally	To continually review and update our Modern Slavery Compliance Statement and related policies in light with changing risks.	Introduce e-learning for all staff and incorporate this into the induction process.	Launch awareness posters on all office and site noticeboards in different languages that is accessible to all employees and workers.  Launch Stronger2gether the Hand-SOS campaign	Incorporate a tool box talk on modern slavery in the annual stand-down on all sites.  Train mental health first aiders and appoint as Modern Slavery Champions.
Externally	Meet with our top 20 critical suppliers, challenging them on how they will continue to combat increased risks as economy declines.	Implement measures where our supply chain's partners meet minimum standards in relation to modern slavery.	Request that our top 20 critical suppliers roll out the Stronger2gether Hand-SOS campaign.	Put in place a requirement that our supply chain audits their compliance to pay the National Minimum Wage.

Signature... *Stuart Wiltshire*..... Date 13 August 2023

**Stuart Wiltshire**

**Managing Director**