



## 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 for JSM Group.

JSM Group is committed to conducting its business to the highest legal and ethical standards at all times 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.

### 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 200 employees and operate in the United Kingdom with our core operations covering London and the South East.

### 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 and Whistleblowing 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.

### Risk and Due Diligence

We recognise that the construction and utilities sectors have particular risks relating to modern slavery and human trafficking. We acknowledge that this risk could possibly 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 occurring in our business and supply chain.



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 of recruitment agencies on our preferred supplier list.

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 of time.

### Next Steps

<b>Internally</b>	To continue to review and update our Modern Slavery Compliance Statement and related policies.	Provide awareness training for all new starters and existing employees during the induction and reinduction process.	Raise awareness through onsite posters, newsletters, eLearning and toolbox talks for operational personnel.	Intend to sign the Construction Protocol with the Gangmasters and Labour Abuse Authority (GLAA) alongside other members of our industry.
<b>Externally</b>	To identify our high risk supply chains and audit them annually.	To develop a programme to manage modern slavery and human trafficking risks in our business and supply chain.	Widen our Supplier Questionnaire to ask questions about modern slavery and human trafficking due diligence processes.	Roll out a specific modern slavery questionnaire to all recruitment agencies.

Signature... *Stuart Wiltshire*..... Date 22 October 2021

**Stuart Wiltshire**  
**Managing Director**