



JN CIVILS MODERN SLAVERY & HUMAN TRAFFICKING POLICY

POLICY STATEMENT

JN Civils is committed to conducting business ethically and with integrity, preventing modern slavery and human trafficking in all our operations and supply chains. We recognise that modern slavery is a serious crime and a violation of fundamental human rights, taking various forms including servitude, forced and compulsory labour, and human trafficking. We have a zero-tolerance approach to modern slavery and are committed to implementing effective systems and controls to ensure it is not taking place anywhere within our business or supply chains.

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

LEGAL COMPLIANCE

This policy ensures compliance with:

- Modern Slavery Act 2015 (Section 54 - Transparency in Supply Chains)
- Human Rights Act 1998
- Employment Rights Act 1996
- Gangmasters (Licensing) Act 2004
- Immigration, Asylum and Nationality Act 2006
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work

FORMS OF MODERN SLAVERY

Modern slavery encompasses:

- **Human Trafficking:** Arranging or facilitating the travel of another person with a view to exploitation.
- **Slavery:** Exercising powers of ownership over a person
- **Servitude:** Obligation to provide services imposed by coercion
- **Forced or Compulsory Labour:** Work or service extracted under menace of penalty.
- **Debt Bondage:** Pledging of personal services as security for debt.

RESPONSIBILITIES

Approved by: Joel Cossins - Managing Director



Managing Director - Approve and sign the annual Modern Slavery Statement, provide leadership and accountability for anti-slavery measures, ensure adequate resources for implementation, and champion ethical business practices throughout the organisation.

HSEQ Director - Oversee the implementation of this policy, ensure due diligence processes are embedded in supply chain management, coordinate training programmes, monitor compliance and report to the Board on modern slavery risks.

Commercial and Procurement Teams - Conduct supplier due diligence, include modern slavery clauses in contracts, assess supply chain risks, and report concerns through appropriate channels.

Human Resources - Verify right to work documentation, conduct employment eligibility checks, ensure fair recruitment practices, and monitor for signs of labour exploitation.

Line Managers - Ensure team awareness of modern slavery indicators, report concerns immediately, and support workers who may be victims of exploitation.

All Employees - Understand and comply with this policy, complete required training, report any concerns or suspicious activity, and treat all workers with dignity and respect.

ORGANISATION STRUCTURE AND SUPPLY CHAINS

JN Civils is a UK-based civil engineering and utilities contractor specialising in infrastructure development, telecommunications, gas operations, and construction projects. Our operations include:

- Civil engineering and groundworks
- Utilities infrastructure installation and maintenance
- Telecommunications network construction.
- Gas operations and distribution works

Our supply chain includes subcontractors, labour providers, material suppliers, equipment hire companies, and professional service providers. We maintain a tiered supplier classification system to manage supply chain risk effectively.

DUE DILIGENCE PROCESSES

JN Civils implements robust due diligence processes to prevent modern slavery:

Supplier Pre-Qualification

- All new suppliers complete our Pre-Qualification Questionnaire (PQQ) which includes specific questions on modern slavery policies and procedures.
- Suppliers must demonstrate compliance with Modern Slavery Act 2015 requirements.
- Evidence of labour provider licensing (GLAA) is required where applicable.
- Right to work verification processes must be evidenced.

Approved by: Joel Cossins - Managing Director



Contractual Requirements

- Modern slavery clauses are included in all supplier and subcontractor contracts.
- Suppliers agree to cascade anti-slavery requirements to their supply chains.
- Termination rights are reserved for any breach of modern slavery provisions.

Ongoing Monitoring

- Regular supplier audits include assessment of modern slavery controls.
- Site inspections monitor working conditions and worker welfare.
- Annual supplier reviews assess continued compliance.

RISK ASSESSMENT AND MANAGEMENT

JN Civils assesses modern slavery risks across our business and supply chain:

High-Risk Areas

- Labour-intensive activities including construction and groundworks
- Use of agency or temporary workers
- Supply chains involving low-cost countries.
- Sectors with high prevalence of migrant workers

Risk Indicators

We train our people to recognise warning signs including workers who appear malnourished, anxious or fearful; evidence of debt bondage; restricted freedom of movement; withholding of identity documents; poor living conditions; excessive working hours; and workers unable to communicate directly with management.

Mitigation Measures

- Tiered supplier risk classification with enhanced scrutiny for higher-risk categories
- Unannounced site visits and worker interviews
- Verification that wages are paid directly to workers.
- Prohibition of recruitment fees being charged to workers

KEY PERFORMANCE INDICATORS

We measure the effectiveness of our anti-slavery measures through:

- Percentage of suppliers who have completed PQQ modern slavery assessment.
- Number of supplier audits conducted including modern slavery review.

Approved by: Joel Cossins - Managing Director



- Percentage of staff who have completed modern slavery training.
- Number of modern slavery concerns reported and investigated.
- Supplier non-conformances identified and resolved.
- Contracts terminated due to modern slavery non-compliance.

TRAINING

JN Civils provides training to ensure understanding of modern slavery risks and our responsibilities:

- Induction training for all new employees includes modern slavery awareness.
- Specific training for procurement and commercial staff on supply chain due diligence
- Site managers receive training on identifying indicators of exploitation.
- HR personnel trained on right to work checks and ethical recruitment.
- Annual refresher training for relevant personnel
- Training records maintained as evidence of competency.

REPORTING CONCERNS

JN Civils encourages all workers, suppliers, and partners to report concerns about modern slavery:

- Report concerns to your line manager, HSEQ Director, or HR
- Use our confidential whistleblowing procedure for anonymous reporting.
- Contact the Modern Slavery Helpline: 08000 121 700
- Report to the police if you believe someone is in immediate danger.

We guarantee that no person will suffer any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place.

BREACH OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We may terminate our relationship with individuals and organisations working on our behalf if they breach this policy. Suppliers found to be involved in modern slavery activities will be removed from our approved supplier list and reported to the relevant authorities.

COMMUNICATION

This policy is communicated to all employees during induction and is available on the company SharePoint. Our annual Modern Slavery Statement is published on our website within six months of our financial year end and is registered on the Government Modern Slavery Statement Registry.

Approved by: Joel Cossins - Managing Director



RELATED DOCUMENTS

- JNC-HSE-POL-001 Health Safety & Wellbeing Policy
- JNC-HSE-PRO-003 Supply Chain Management Procedure
- JNC-HR-POL-001 Whistleblowing Policy
- JNC-HR-POL-002 Equal Opportunities Policy
- JNC-COM-PRO-001 Supplier Pre-Qualification Procedure
- JNC-HSE-FRM-MS01 Modern Slavery Supplier Assessment Form

Approved by: Joel Cossins - Managing Director

Document Owner: HSEQ Director | **Issue Date:** December 2025 | **Review Date:** December 2026 | **Document Reference:** JNC-HSE-POL-023
Modern Slavery | **Revision:** 1.0