

Modern Slavery & Human Trafficking Statement

This policy statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and sets out the actions 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. It applies to JSM Group Holdings Limited, including all UK and International subsidiaries and personnel.

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 in all its forms across the business and supply chains.

Responsibilities

The Chief People Officer is responsible for assessing people risks across our business including at recruitment and during operations and providing mandatory training on Modern Slavery which was completed in the last 12 months.

The Procurement Director and commercial teams are responsible for communicating JSM requirements throughout our supply chain and form part of our supplier assessment processes. In the last 12 months JSM has established a revised minimum set of standards for its supply chain and incorporated these into our assessment and approvals process.

The Chief Risk & Safety Officer provides overall Risk Management and Governance support and acts as an independent function through the Whistleblowing Policy and Internal Audit. In the last 12 months we have risk profiled our current supply chain and focussed systematic audits on our material suppliers of labour and undertaken spot check on operational sites.

The Board actively promotes leadership in Modern Slavery prevention and commits to reviewing this policy annually or following significant organisation or legislative change and to communicate it within the organisation and externally to interested parties.

Organisational Structure and Supply Chains

JSM Group is a utilities service provider specialising in the delivery of integrated power, communications, and gas solutions. Employing around 360 employees our workforce is supplemented through a range of sub-contractors and workers. Our operations are predominantly in the United Kingdom with exploratory operations in Germany and the Middle East. Our wider supply chain of products and material includes suppliers outside the European Union.

Policies

As part of its comprehensive management system, JSM implements a variety of policies and processes designed to manage the risks relating to modern slavery and human trafficking issues. These include our Environmental, Social & Governance Policy, Ethical Purchasing Policy, Whistleblowing Policy, Anti-Bribery and Right to Work Policy.

Risk Assessment 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 and take appropriate action to mitigate these risks.

For our employed workforce, JSM undertakes the following due diligence measures: Pre-employment checks including the right work as part of our recruitment process and ensuring each employee has their own individually names bank account. Additional attention is paid to candidates where personal documents or communication during onboarding is through a third individual (unless there is a known disability) to reduce the risk of exploitation, modern slavery and human trafficking.

For our sub-contractors and supplier, JSM undertake due diligence during our subcontractor onboarding process through our 'Subcontractor Questionnaire' with audits and spot checks undertaken adopting a risk-based approach, with sub-contractor right to work checks recorded centrally. 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. Maintaining awareness for multiple people at the same address, contact numbers or individuals' reluctance to engage, withdrawn or showing signs of neglect.

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

Reporting

Any individual with concerns regarding modern slavery or trafficking, are encouraged to make use of JSM's Whistleblowing Policy. Information and opportunities to report are also available via the Gangmasters and Labour Abuse Authority (GLAA) 0800 432 0804 and Modern Slavery Helpline on 0800 0121700.

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

Future Action

In the coming months, JSM expects to extend its operations into mainland Europe and potentially further afield. Our plans therefore encompass further governance of our existing operations and extension of this control into new markets with a focus on.

- Review of all our policies and processes as part of a wider Internal Control Improvement Programme supporting our international growth
- Next phase of supplier approvals and assessment implementation
- Continued Mandatory training on Modern Slavery
- Audit of all labour providers and sub-contractors
- Risk Assessment of new markets/operating countries

A handwritten signature in black ink, appearing to read 'M Booth'.

Michael Booth
Chief Executive Officer

Date: 1 June 2026

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