

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 employee people risks across our business, including at recruitment and during operations, and for providing mandatory training on Modern Slavery. This is delivered through our Competency Cloud e-learning programme, with completion recorded centrally, all employees enrolled, and outstanding completions followed up through line management.

Governance of procurement sits with the Chief Financial Officer. The Chief Operating Officer and Head of Procurement are responsible for day-to-day delivery, including communicating JSM requirements throughout our supply chain, and they 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, focussed systematic audits on our material suppliers of labour and undertaken spot checks on operational sites.

The Chief Executive Officer holds overall accountability for this statement and its publication under section 54 of the Modern Slavery Act 2015. The Board actively promotes leadership in Modern Slavery prevention and commits to reviewing this policy annually or following significant organisational or legislative change, and to communicating 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 and communications 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 materials 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 Policy and Right to Work Policy.

Risk Assessment and Due Diligence

We recognise that the construction and utilities sectors carry elevated risks relating to modern slavery and human trafficking, and we acknowledge that these risks could occur within our own workforce and supply chain. We have assessed our exposure and consider the highest-risk areas of our business and supply chain to be:

- Sub-contracted and agency labour engaged on our operational sites, where recruitment is undertaken by third parties;
- Lower tiers of our supply chain for products and materials, particularly suppliers and manufacturers based outside the European Union, where visibility of labour practices is reduced; and
- New markets and operating countries associated with our planned international expansion.

These risks are assessed through our supply chain risk profiling, recorded within our risk management framework, and managed through the due diligence measures set out below, with audit activity prioritised on a risk basis towards material suppliers of labour.

For our employed workforce, JSM undertakes the following due diligence measures: pre-employment checks, including right to work, as part of our recruitment process, and ensuring each employee has their own individually named 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 suppliers, JSM undertakes due diligence during our subcontractor onboarding process through our 'Subcontractor Questionnaire', with audits and spot checks undertaken adopting a risk-based approach, and 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 of multiple people at the same address or contact numbers, or individuals' reluctance to engage, appearing 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.

Measuring Effectiveness

We assess the effectiveness of the steps we take through monitoring of mandatory Modern Slavery training completion across our workforce, risk-based audits and spot checks of our material suppliers of labour, central recording of sub-contractor right to work checks, and review of any concerns raised through our whistleblowing and reporting channels. The outcomes of these activities are reviewed by the Board as part of the annual review of this statement.

During the last 12 months, no instances of modern slavery or human trafficking were identified in our business or supply chain through these activities. We do not treat the absence of reports as an absence of risk, and we continue to strengthen our controls and awareness across the business and supply chain.

To strengthen how we measure and report our performance, we have established the following key performance indicators, against which we will report in our next annual statement:

Performance Indicator	Target
Employees completing mandatory Modern Slavery training	100% of in-scope employees

Material suppliers of labour audited against JSM minimum standards	100% within the audit cycle
Sub-contractor right to work checks recorded centrally	100% prior to site deployment
Modern slavery concerns raised via whistleblowing or helplines	All investigated promptly, with outcomes reported to the Board
Supplier non-compliance identified through audit and spot checks	Action plans issued and closed out, or supplier replaced

Reporting

Any individual with concerns regarding modern slavery or trafficking is 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) on 0800 432 0804 and the Modern Slavery Helpline on 0800 0121 700.

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

This statement was reviewed and approved by the Board of JSM Group Holdings Limited.



Michael Booth
Chief Executive Officer

Date: 13 August 2026

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