MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Company Type: Private Limited Company (Incorporated 27 October 2010)
Company Number: 07420937
Financial Year Ending 31 October 2026

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps JN Civils Ltd has taken during the financial year ending 31 October 2026.

Introduction

JN Civils Ltd is committed to conducting business ethically, responsibly, and with integrity. We maintain a zero-tolerance approach to modern slavery and human trafficking in any form and take active steps to prevent it within our operations and supply chains.

Our Organisation

JN Civils Ltd is a UK-based civil engineering and utilities contractor specialising in:

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

Our workforce includes directly employed staff, agency workers, subcontractors, consultants and labour providers. Our supply chain includes subcontractors, material suppliers, plant and equipment hire companies, labour providers and specialist service providers.

Supply Chain & Risk Areas

We recognise that the construction, groundworks and utilities sectors may present elevated risks, particularly where:

- Labour-intensive subcontracting is used
- Agency or temporary labour is involved
- Workers may be migrants or otherwise vulnerable
- Lower-tier suppliers operate outside the UK

We assess these risks through structured due diligence processes based on supplier type, geographical location, labour dependency and service category.

Policies & Governance

Compliance with anti-slavery requirements is supported by:

- Modern Slavery & Human Trafficking Policy
- Whistleblowing Policy
- Right-to-Work & Employment Eligibility Checks
- Anti-Bribery & Ethical Conduct Policy
- Supplier Contract & Procurement Protocols

Directors and senior managers retain accountability for governance and oversight.

Actions Taken During 2025/26

During the 2025/26 financial year JN Civils Ltd undertook the following actions:

- Completed several supplier audits across high-risk civil engineering and utilities worksites.
- Delivered modern slavery induction training to all new employees and refresher training to relevant staff groups.
- Conducted right-to-work and identity verification for every new worker engaged this year.
- Updated all subcontractor and labour-provider contracts to strengthen anti-slavery clauses.
- Carried out several unannounced inspections on high-risk subcontractors.
- Investigated all reported concerns — no confirmed cases were identified.

Due Diligence Measures

We carry out a range of due diligence activities to prevent slavery and human trafficking within our operations and supply chain**:**

Supplier Pre-Qualification

All new suppliers complete a Pre-Qualification Questionnaire (PQQ).

- Modern slavery compliance checks
- GLAA licence verification where required
- Right-to-Work checks
- Risk scoring and enhanced scrutiny for high-risk suppliers.

Contractual Controls

- Anti-slavery clauses in all contracts
- Requirement for suppliers to cascade obligations
- Immediate termination rights for breaches.

Ongoing Monitoring

- Supplier audits
- Worker interviews & welfare checks
- Annual compliance reviews
- Monitoring of high-risk suppliers
- Corrective action tracking.

Training & Awareness

We deliver training appropriate to job roles, including:

- Modern slavery awareness for all new starters
- Enhanced due-diligence training for commercial and procurement teams
- Site manager training on recognising exploitation indicators
- HR training on right-to-work checks, ethical recruitment and worker welfare
- Annual refresher training for relevant staff groups

Training records are maintained to evidence participation and competency.

Reporting Concerns

Everyone working for or with JN Civils Ltd is encouraged to report suspicions of modern slavery. Reports can be made to:

- Line managers
- Human Resources
- HSEQ Director
- Confidential whistleblowing system

We guarantee that no person reporting concerns in good faith will suffer retaliation or detrimental treatment. Concerns can also be reported externally via the Modern Slavery Helpline (08000 121 700).

Key Performance Indicators

To assess our effectiveness, we monitor:

- 100% of new suppliers completed modern slavery PQQ checks
- 100% of identified high-risk suppliers underwent enhanced checks
- 100% of new employees completed induction training
- 0 confirmed modern-slavery incidents
- 100% of corrective actions from audits closed within required timeframes.

Future Commitments for 2026/27

We will continue to strengthen our approach by:

- Auditing across supply chain tiers
- Increase the number of unannounced inspections undertaken across high-risk suppliers and subcontractors.

- Enhance training content and frequency
- Improve data capture systems for worker welfare
- Publish this statement on our company website
- Submit this statement to the Government Modern Slavery Registry by November 2026

Public Availability

This statement will be published on the JN Civils website no later than 30 November 2026. JN Civils has registered for the UK Government Modern Slavery Statement Registry.

Approval

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the JN Civils Ltd Modern Slavery & Human Trafficking Statement for the financial year ending 31st October 2026. This statement was approved by the Board of Directors of JN Civils Ltd on 01/11/2026 and is signed on behalf of the Board by the Managing Director.

JNC Managing Director:



Joel Cossins
Dated: 01/11/2026