Modern Slavery Policy Statement

Introduction from Chairman

Modern Slavery is an abhorrent and heinous violation of fundamental human rights and we have a zero-tolerance policy towards the forced labour and exploitation of others for personal or commercial gain of any description within our business or supply chains.

We are committed to acting ethically and with integrity in all our business dealings and relationships and fully recognise our moral and legal responsibility to help prevent modern slavery and human trafficking from occurring.

This statement sets outs the steps we are taking to identify, understand and address the risks of modern slavery in our businesses and supply chains.

We will continually review to keep under close review the effectiveness of our Modern Slavery Policy and the supporting processes and procedures to ensure they are fully effective.

Group Structure

The JRL Group is a privately-owned group consisting of 30 subsidiary operating companies (listed in appendix 1) operating in both the public and private sector providing subcontract services, construction contracting, support services, and residential development solely in the UK.

The Group Head office is in Borehamwood and we employ circa 1500 employees.

Responsibility

We have appointed our Group Finance Director as the key point of contact for any employee concerns relating to the modern slavery and Human Trafficking within our business and supply chains.

Independent Advice

Individuals seeking external advice can contact organisation such as the independent charity 'Unseen' for free, independent and confidential advice – see below for details:

Protect

Telephone

Unseen Advice Line: 0800 0121700

Web

www.unseenuk.org

Due Diligence and Compliance

As part of our initiative to identify and mitigate risk, we have undertaken a risk assessment using our professional legal, risk and procurement teams to determine our risk exposure within the group businesses and supply chains.

This identified the high-risk areas, which we have commenced the method of determining the appropriate process and procedural intervention to mitigate these.

Continuing intervention:

- Maintained the Modern Slavery Act 2015 within our Risk Register to ensure the risk continues to be flagged, assessed and appropriately addressed.
- Continuing site checks for all personnel working on our sites to ensure they are entitled to work in the UK by reviewing original passports, visa's, taxation and other relevant documentation.
- Tender process includes mandatory exclusion of any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Slavery Act 2015.
- Contractual provision for the termination of a supply chain partner in the event of a modern slavery or human trafficking compliance breach.

Key to successfully preventing modern slavery and human trafficking is our supply chain and our employees' knowledge and training which we have set out below: -

Supply chain

We predominantly service our business activity from within the UK and EU and our supply chain consists of subcontractors, consultants, labour agencies, product and material suppliers, service providers, joint venture partners and clients – each and all will comply with our Modern Slavery Policy.

Key to our success of reducing the modern slavery and human trafficking is to ensure our supply chain partners adherence and stringent application of our Policy in addition to their own measures.

We continue to review and monitor our supply chains knowledge and awareness of this issue and the steps they are taking to ensure compliance to the act and that their staff and suppliers are aware of the issue and have been adequately trained.

During this period we have:

- Maintained the provision within our tender documentation which includes the mandatory exclusion of any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Slavery Act 2015.
- Included contractual requirement in all subcontract order stating compliance and adherence to the Modern Slavery Act 2015, and our policy.
- Include the provisions for termination in the event of a modern slavery or human trafficking compliance breach by the supplier.
- All supply chain partners are required to accept our right to audit their activities and (where appropriate) relationships, both routinely and at times of reasonable suspicion.
- Investigated the possibility of requiring all supply chain partners to be registered with CHAS

During 2026 we will continue to work with our supply chain partners to develop process, procedure, guidance, and training to assist them in delivering the appropriate awareness training on the issue to their employee's and that they have commenced the instigation appropriate measures to comply with our Policy and the Modern Slavery Act.

Training

We have raised general organisational awareness by circulating an article to all staff explaining the process in preparing this statement and have commenced the review of our employee's awareness and knowledge of issues.

Our Modern Slavery Policy will be included in a series of Management System briefings that will be carried out at all sites and within head office.

We are exploring the most effective medium to communicate this further training and awareness that is likely to involve a range of methods from online training, poster campaigns, electronic communication and training courses.

(A) Management responsibility and general awareness

We have:

- Agreed management responsibility for this policy and statement and received unanimous endorsement from our Executive Management Team and our Board.
- Raised general organisational awareness by circulation an article to all staff explaining progress in preparing this statement.

(B) Risk assessment

We have:

- Undertaken an assessment using our professional legal, risk and procurement teams to determine our risk exposure.
- Established that our primary risk is association with a Delivery Partner, Framework participant or company with an ambiguous or non-compliant supply chain.
- Included the Modern Slavery Act 2015 within our statutory and regulatory Compliance Risk Register to ensure the risk continues to be flagged, assessed and appropriately addressed.

(C) Risk mitigation

- Act promptly where a compliance breach has been identified or flagged.
- Continue to feed-back lessons learnt into the compliance risk management process.

Due to the continued growth of the business and percentage of new employees we have determined that we need to continue our awareness and training programme in 2026 in the form of tool box talks to ensure that all staff understand the risks of modern slavery and human trafficking and have the appropriate knowledge and awareness to identify any infiltration into our business and supply chain.

Measuring performance

As part of our management system audits carried out at all sites, we review the business and supply chain in order to monitor compliance with our Modern Slavery Policy, identify any potential or actual breaches so we can modify / improve our procedures and processes if required.

The Statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the financial year ending 31st December 2025 in respect of the companies listed in Appendix 1.



Kevin Keegan
Managing Director
January 2026

Appendix 1

- J Reddington Ltd
- JRL Plant and Logistics Ltd
- London Tower Crane Hire & Sales Ltd
- Thames Reinforcements Ltd
- Midgard Ltd
- Stair Master Ltd
- UK Facades Ltd
- JRL Civil Engineering Ltd
- Trent Precast Concrete Ltd
- London Concrete Pumping Ltd
- JRL Drylining Ltd
- Ark Mechanical and Electrical Services Ltd
- JRL Environmental Ltd
- Midgard Design Services Ltd
- Midgard City Ltd
- Slipstructures Ltd
- Quantum Gate Ltd
- Midgard Brighton Marina Ltd
- JRL Demolition Ltd
- Trent SFS Ltd
- JRL Structures Ltd
- McMullen Facades Ltd
- Midgard Public Sector Ltd
- JRL Access Ltd
- JRL Brick-Slip Systems Ltd
- Woodland Environmental Ltd
- Anglo Swiss Facade Design Ltd
- JRL Modular Ltd
- JRL Trading (2) Ltd
- JRL Trading (3) Ltd