

## Modern Slavery & Human Trafficking Policy

### JSPC Group LTD

#### 1. Purpose and Policy Statement

JSPC Group LTD is committed to conducting business ethically, responsibly, and with integrity. We recognise our responsibility to respect and protect human rights and are fully committed to preventing modern slavery, forced labour, and human trafficking in our business operations and supply chains.

We adopt a **zero-tolerance approach** to modern slavery and human trafficking and are committed to acting in accordance with the **UK Modern Slavery Act 2015**, relevant labour legislation, and the principles set out in **Network Rail's Supplier Code of Conduct**.

This policy sets out the steps JSPC Group LTD takes to identify, prevent, and mitigate the risk of modern slavery within our organisation and across our supply chain.

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#### 2. Scope

This policy applies to:

- All directors, employees, agency workers, and labour supplied to JSPC Group LTD
- All subcontractors, suppliers, and business partners
- All activities undertaken on behalf of JSPC Group LTD, including work delivered for Network Rail and its clients

Compliance with this policy is mandatory.

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#### 3. Our Standards and Expectations

In line with Network Rail's Supplier Code of Conduct, JSPC Group LTD is committed to ensuring that:

- Employment is freely chosen and no forced, bonded, or involuntary labour is used
- No worker is subject to human trafficking, coercion, threats, or abuse
- Workers are not required to surrender identity documents, passports, or pay recruitment fees
- Workers are free to leave employment subject to reasonable contractual notice

- All workers are treated with dignity, fairness, and respect
  - Working hours, wages, and conditions comply with applicable laws and industry standards
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#### **4. Governance and Responsibility**

Ultimate responsibility for this policy sits with the **Directors of JSPC Group LTD**, who ensure that appropriate systems and controls are in place to manage modern slavery risks.

Managers and supervisors are responsible for:

- Implementing this policy within their areas of responsibility
  - Remaining alert to indicators of modern slavery
  - Ensuring labour and subcontractors engaged on sites are compliant
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#### **5. Risk Assessment and Due Diligence**

JSPC Group LTD recognises that modern slavery risks may be higher in certain areas, including labour-intensive activities and the use of subcontracted or agency labour.

To manage these risks, we will:

- Assess modern slavery risks within our operations and supply chain
  - Undertake proportionate due diligence on suppliers and subcontractors
  - Require suppliers to confirm compliance with modern slavery legislation
  - Review labour sourcing practices where higher risk is identified
  - Take appropriate action where concerns are raised or identified
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#### **6. Supply Chain Requirements**

JSPC Group LTD expects all suppliers, subcontractors, and labour providers to:

- Comply with the UK Modern Slavery Act 2015
- Operate in accordance with Network Rail's Supplier Code of Conduct
- Have appropriate policies and procedures to prevent modern slavery
- Ensure their own supply chains uphold equivalent standards

- Cooperate with audits, inspections, or requests for information

Failure to meet these requirements may result in corrective action, suspension, or termination of contractual arrangements.

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## **7. Training and Awareness**

JSPC Group LTD is committed to ensuring appropriate awareness of modern slavery risks. We will:

- Provide information and guidance to employees and managers
  - Ensure individuals involved in recruitment, procurement, and site supervision understand their responsibilities
  - Promote awareness of reporting and whistleblowing arrangements
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## **8. Reporting and Whistleblowing**

JSPC Group LTD encourages the reporting of any concerns relating to modern slavery or unethical labour practices.

Concerns may be raised through:

- Line management
- Senior management
- The company's whistleblowing procedure

All reports will be treated seriously, confidentially, and without fear of retaliation. Any confirmed incidents will be investigated promptly and escalated where appropriate.

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## **9. Non-Compliance and Corrective Action**

Any breach of this policy will be taken seriously. Where modern slavery risks or incidents are identified, JSPC Group LTD will:

- Take immediate steps to protect affected individuals
  - Require corrective actions to be implemented
  - Terminate contracts where serious or persistent breaches occur
  - Notify relevant authorities where legally required
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## 10. Continuous Improvement and Review

JSPC Group LTD is committed to continuous improvement in preventing modern slavery. This policy will be:

- Reviewed at least annually
- Updated to reflect changes in legislation and Network Rail requirements
- Communicated to relevant stakeholders

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## 11. Approval

This policy has been approved by the Directors of JSPC Group LTD and is effective immediately.

**Signed:**

Director

**JSPC Group LTD**

Date:                     

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