



## MODERN SLAVERY ACT 2015

JLES Group Limited (and subsidiaries) recognises that it does not have the statutory obligation under s.54 of the Modern Slavery Act 2015. However, as a commitment to eradicate Modern Slavery this statement sets out the steps that JLES has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. JLES has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our Business**

JLES provides single source, fixed cost solutions to complex engineering infrastructure and construction projects as well as bond management and efficient reduction of liabilities. We operate throughout the UK with offices in 6 locations across England and Wales. Our approved supplier chain is extensive and effective.

### **Our high-risk areas**

It is likely our supply chain may employ individuals from outside of the UK and JLES will review our supply chain to understand they are taking any appropriate measures to ensure eligibility to work checks are carried out.

The construction industry is a notoriously 'dirty' industry therefore appropriate welfare arrangements must be in place on site as well as a wealth of information on health and wellbeing made available to our employees and subcontract individuals on site. JLES conduct regular site visits and have minimum standards which must be met.

### **Our Policies**

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-Slavery policy. This policy sets out the organisations stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Equal Opportunities Policy. This policy ensure that individuals are treated fairly in all aspects of employment.
3. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
4. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
5. Code of conduct. This code explains the way we behave as an organisation and how we expect our employees to act.
6. Anti-Bribery and Corruption policy. The policy sets out the organizational requirements and restrictions in relations to bribery and corruption.

**Our suppliers**

JLES operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisations has never been convicted of offenses relating to modern slavery and on-site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:


1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery
3. We may terminate the contract at any time should any instances of modern slavery come to light.

**Training**

We regularly conduct training for our employees so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

**Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

**Signed**  
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For and on behalf of JLES Group Limited  
**Paul Tomlinson**  
Director

**Date**

22/02/2022

**Review Date**

FEBRUARY 2023