

Modern Slavery Statement

Jackson Civil Engineering Group Ltd (Jackson) is committed to identifying, preventing and mitigating the risks of modern-day slavery and human trafficking in our operations and supply chains. This Statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and aligns with the updated 2025 Transparency in Supply Chains (TISC) Statutory Guidance, which encourages a 'race to the top' through proactive transparency. We recognise that modern slavery is a hidden crime, and we take a victim-centred approach to remediation if exploitation is uncovered. This document covers the financial year to 31st December 2025.

Company Structure and Supply Chain Mapping:

Jackson is a civil engineering contractor operating primarily in England and is part of One Group Construction Ltd.

Our procurement activities take place in England, and our supply chain partners are predominantly UK and EU based.

In 2025, we have moved beyond mapping only Tier 1 (direct) suppliers to identifying Tier 2 (indirect) suppliers and beyond, particularly for high-risk materials such as timber, steel, and stone. We also map our labour supply chain, scrutinizing how and from where workers are recruited to ensure transparency in recruitment pathways.

Policy Framework:

Our anti-slavery initiatives are led by the Board of Directors and Senior Leadership Team. Our rules are contained within CP 301.21 Sustainability Code – People, which has been updated to align with the UN Guiding Principles on Business and Human Rights and ILO Labour Standards.

Key Policy Prohibitions:

- Jackson Strictly prohibits the charging of worker-paid recruitment fees. Recruitment is a business cost and must be borne by the employer.
- We prohibit the confiscation of original identification documents, ensuring all workers retain their passports and visas.
- We acknowledge the requirements of the Procurement Act 2023, which empowers public bodies to exclude suppliers where there is compelling evidence of modern slavery in their chains – a critical consideration for our public sector infrastructure projects.

Risk Assessment:

- We identify the construction industry as high-risk due to the heavy use of sub-contractors, temporary labour, and unskilled manual roles.
- We monitor for vulnerabilities among migrant workers and temporary staff who may be susceptible to debt bondage or deceptive recruitment.
- We standardise the sourcing of high-risk materials through partners with SA800 certification or equivalent standards.

Due Diligence and Remediation:

- We will conduct spot-checks in line with the risk profile to ensure compliance with our code of conduct.
- We maintain a confidential Whistleblowing policy and workers can report concerns anonymously via our dedicated WorkSafe code confidential reporting helpline.
- If a case of modern slavery is found, our priority is the safeguarding of victims. We commit to providing access to justice and support services rather than immediate contract termination, which could exacerbate the victim's vulnerability.

Training and Effectiveness:

In 2026 we will continue our Modern Slavery Learning pathways by:

- All new starters will complete a self-directed module on identifying red flags in construction
- We have tailored specific training for our procurement and HR teams on spotting illegal recruitment fees.
- To measure our progress, we track:
 - The percentage of staff who have completed refreshed training modules
 - The number of Tier 1 and Tier 2 suppliers audited
 - Employee confidence levels in identifying signs of exploitation via anonymised surveys.

2026 Commitments:

1. We are investigating new software systems to aid in Right to Work checks to reduce human error and fraud.
2. We will review all policies annually to ensure they remain compliant with the latest Home Office Guidance.
3. We will review our current self-directed learning modules and the linked resources to ensure it captures current practices and guidance and where required, workers will take a refreshed module in line with our company training schedule
4. We will proactively upload this statement to the central government registry to provide full transparency to our clients and stakeholders.

I, Brian Crofton, hereby certify that this statement was approved by the board of directors of Jackson Civil Engineering Group Ltd on 29th April 2026.



Brian Crofton, Managing Director

April 2026