

# Modern Slavery Policy

**Document Owner:** Mark Evans

**Version:** 1.0

**Approval Date:** 29/09/2025

**Next Review Date:** 29/09/2026

## 1. Purpose and Scope

This policy reflects our commitment to respecting human rights, specifically addressing modern slavery risks in our operations and across our supply chain within the UK construction industry. It applies to all employees, contractors, subcontractors, suppliers, and other business partners.

---

## 2. Legal and Policy Framework

### UK Modern Slavery Act 2015 ("MSA 2015")

- The statement is board-approved, signed by a director and published on the company website.

### Transparency in Supply Chains ("TISC") Guidance

- This policy provides a detailed structure for modern slavery statements, including content, approval processes, publication, and the Modern Slavery Statement Registry.

### Standards & Legislative Enhancements

- We aim to follow the British Standards Institution's **BS 25700** offering a robust standard for addressing modern slavery risk and improving transparency
-

### 3. Risk Profile — Construction Industry Insights

- The **construction sector** is identified by regulators (e.g., ODLME, CIOB) as high risk due to its scale, use of subcontracting, and poor visibility into the workforce [CIOB+1](#).
  - Reports indicate labour exploitation constitutes a large portion of modern slavery cases in construction [Unseen](#).
  - **Unseen** and charities have produced awareness tools—e.g., a film with major firms—to highlight signs of exploitation [Unseen](#).
  - Common indicators include: confiscated documents, isolation, lack of possessions, injury, odd working hours, and escort-controlled transportation [CIOBCHASInfobric](#).
  - Appointing **Modern Slavery Champions**, regular training, and supplier pre-qualification (e.g., via Constructionline) are considered best practices [constructionline.co.ukCIOB](#).
- 

### 4. Policy Components

#### A. Risk Assessment & Due Diligence

- We have mapped and evaluate high-risk areas in operations and supply chains which exist mainly in contract labour.
- We apply due diligence based on BS 25700 standards where possible.
- We conduct right-to-work and identity checks (via digital platforms like Construct.id or MSite)
- We audit suppliers for wage practices, housing, documentation, transportation, labor practices.

#### B. Supplier Engagement & Contractual Measures

- Embed anti-slavery via contractual compliance with our policy requiring compliance throughout our subcontractors.
- Support and educate suppliers rather than penalize—build capability where possible

### C. Training & Awareness

- We provide tailored training for frontline staff, supervisors, procurement, and HR on modern slavery indicators and internal reporting lines via awareness tools like the Unseen film and materials [Unseen](#).
- Our appointed **Modern Slavery Champions** across departments to raise awareness and act as points of contact – [Lynn@jnoad.co.uk](mailto:Lynn@jnoad.co.uk) .

### E. Reporting & Remediation

- Immediate reporting to Company champion [Lynn@jnoad.co.uk](mailto:Lynn@jnoad.co.uk)
- Company Champion Liaison with authorities (Police, GLAA, Modern Slavery Helpline, NCA) for suspected cases
- Ensure no confrontation with suspected victims to avoid harm; instead escalate to authorities or NGOs
- Provide internal support, referral to charities like Unseen, ensure safety of whistle-blowers and victims.

### F. Monitoring & KPIs

- Track metrics such as training completion rates, supplier audits conducted, right-to-work checks, supplier compliance.
- Evaluate annual changes in risk exposure and remediation actions.

### G. Continuous Improvement

- Align with future legislative developments—We prepare to enhance due diligence and reporting obligations.
  - Review and refresh policies annually in line with evolving best practices, including BS 2570.
-

## 5. Illustrative Examples of Indicators in Construction

Scenario	Possible Red Flags
A labourer arrives early, leaves late, is escorted to & from the site	Indicates control and restricted freedom <a href="#">CHASInfobric</a>
A worker lacks ID/passport, appears malnourished, or appears frightened	Signals exploitation or trafficking <a href="#">CIOBCHAS</a>
Multiple workers living at same address, sharing bank details or mobile number	Suggests coercion and centralized control <a href="#">CIOB</a>
Absence of safety training, poor personal protective equipment, injuries untreated	Potential indicator of coerced labor with disregard for safety <a href="#">ICAEW</a>
Suppliers missing right-to-work documentation or using cash-in-hand payments	Legal non-compliance and potential exploitation <a href="#">Infobric</a>

---

## 6. Policy Statement

**Jnoad** condemns modern slavery and is committed to implementing robust policies and practices to prevent it across our business and supply chains.

We uphold the requirements of the **Modern Slavery Act 2015**, publish an annual modern slavery statement (board-approved and director signed), and embed effective due diligence, supplier expectations, training, and monitoring throughout our construction activities.

Our aim is to identify and address risks early, support victims, and contribute to broader industry efforts to eradicate forced labour and exploitation.

---

## 7. Conclusion

This policy combines statutory requirements of the **Modern Slavery Act**, practical sector-specific implementation, alignment with best-in-class frameworks (like **BS 25700**), and real-world examples from UK construction. It provides a strong foundation for our organisation to proactively combat modern slavery.

## 9. Approval

**Approved by:**

Mark Evans

Policy Owner

A handwritten signature in black ink that reads "Mark Evans". The signature is written in a cursive style with a large, stylized 'M' and 'E'.

Date: 29<sup>th</sup> September 2025