

J J E ELECTRICAL CONTRACTORS LTD

PART OF THE J J E GROUP

MODERN SLAVERY & HUMAN TRAFFICKING POLICY AND STATEMENT

Document Control

Company	J J E Electrical Contractors Ltd
Group	Part of the J J E Group
Company Registration Number	16182299
Business Address	78 Review Road, Neasden, NW2 7BD, United Kingdom
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Directors	Mr Sean Michael Kerrigan & Mr John Joseph Kerrigan
Effective Date	27 August 2026
Review Frequency	At least annually and following significant changes
Next Review	August 2027
Version	1.0

Director Approval

This policy has been approved by the Directors of J J E Electrical Contractors Ltd and is intended to be reviewed at least annually.

Director: Mr Sean Michael Kerrigan

Signature: 

Date: 27/08/2026

Director: Mr John Joseph Kerrigan

Signature: 

Date: 27/08/2026

1. Policy Statement

J J E Electrical Contractors Ltd, part of the J J E Group, is committed to conducting its business ethically, responsibly and with respect for human rights. We have a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude, exploitation and unlawful child labour in any part of our business, workforce, supply chain or subcontracting arrangements.

2. Our Commitment

J J E Electrical Contractors Ltd will never knowingly use forced, bonded or compulsory labour; never knowingly employ or engage anyone who has been trafficked or exploited; comply with applicable UK employment and right-to-work requirements; assess modern slavery risks proportionately; carry out appropriate supplier and subcontractor due diligence; provide awareness and training; encourage concerns to be raised without retaliation; investigate allegations appropriately; take corrective action; and continually review and improve our approach.

3. What Is Modern Slavery?

Modern slavery is an umbrella term covering slavery, servitude, forced or compulsory labour and human trafficking. It can involve coercion, threats, deception, abuse of vulnerability, debt bondage, unlawful restriction of movement, confiscation of identity documents, exploitative recruitment, unlawful wage practices and other forms of control or exploitation.

4. Legal and Regulatory Framework

The company will comply with applicable UK legislation and guidance, including the Modern Slavery Act 2015, relevant employment legislation, National Minimum Wage requirements, Equality Act 2010, health and safety law, applicable labour-provider licensing requirements and right-to-work requirements. Section 54 of the Modern Slavery Act currently applies to qualifying commercial organisations carrying on business in the UK, supplying goods or services and having annual turnover of £36 million or more.

5. Company Structure and Activities

J J E Electrical Contractors Ltd is a UK electrical contracting company forming part of the J J E Group. Activities include domestic, commercial and industrial electrical installations; testing and inspection; maintenance; EV charging; solar-related electrical works; fire alarms; remedial works; and associated electrical engineering services. Our workforce may include employees, subcontractors, labour-only workers, specialist contractors, suppliers and other third parties.

6. Supply Chain

Our supply chain may include electrical wholesalers, manufacturers, cable and equipment suppliers, tool and PPE suppliers, plant providers, transport and waste contractors, specialist subcontractors, labour providers, recruitment agencies, construction contractors and professional service providers. We recognise that risks may exist beyond immediate suppliers and will use a proportionate risk-based approach.

7. Modern Slavery Risk Assessment

Risk factors may include the nature and location of work, use of subcontractors or labour agencies, recruitment practices, temporary or migrant labour, worker vulnerability, complex international supply chains and higher-risk goods. Risk assessments will be reviewed periodically and when significant changes occur.

8. Supplier and Subcontractor Due Diligence

Before engaging significant suppliers or subcontractors, the company may undertake company verification, insurance and licence checks, review employment and recruitment arrangements, request modern slavery policies or declarations, use risk-based questionnaires, include contractual requirements and conduct audits or site inspections where proportionate.

9. Contractual Requirements

Where appropriate, supplier and subcontractor agreements will require compliance with this policy and applicable modern slavery legislation, notification of suspected exploitation, cooperation with investigations and equivalent standards for lower-tier subcontractors. Serious or persistent non-compliance may lead to corrective action, increased monitoring, suspension or termination.

10. Recruitment and Employment

We are committed to responsible recruitment. Workers should understand their employment arrangements, receive appropriate documentation, be paid lawfully, not be charged inappropriate recruitment fees, be free from coercion and retain control of personal identity documents. Recruitment agencies will be subject to proportionate checks.

11. Right to Work

Appropriate right-to-work checks will be undertaken in accordance with UK requirements. Immigration status must never be used as a mechanism to exploit, threaten or coerce workers.

12. Child Labour

The company has a zero-tolerance approach to unlawful child labour and will comply with requirements relating to minimum working ages, young workers, working hours, education and health and safety. Particular care will be taken with apprentices and trainees.

13. Forced Labour

Forced or compulsory labour is strictly prohibited. No worker shall be forced to work through threats, prevented from leaving employment unlawfully, subjected to coercion, debt bondage, unlawful wage control or confiscation of identity documents for the purpose of control.

14. Indicators of Modern Slavery

Potential indicators include fear or intimidation, controlled communication, limited control over wages, unusual accommodation or transport arrangements, lack of identity documents, unexplained wage deductions, excessive hours, recruitment debt, reluctance to discuss employment and evidence of threats. One indicator alone does not necessarily prove modern slavery, but concerns should be reported.

15. Reporting Concerns

Concerns may be reported to the Company Directors, Mr Sean Michael Kerrigan or Mr John Joseph Kerrigan, via 020 3996 0933 or info@jjelectricalcontractorsltd.com. Employees may also use established grievance or whistleblowing procedures. Where appropriate, concerns may be escalated to relevant authorities.

16. No Retaliation

The company will not tolerate retaliation against anyone who raises a genuine concern, refuses to participate in suspected illegal activity, cooperates with an investigation or reports suspected exploitation in good faith.

17. Investigation and Response

Reported concerns will be assessed promptly. Depending on circumstances, the company may protect potentially vulnerable workers, review records, interview relevant personnel, investigate supplier arrangements, suspend activities, obtain specialist advice and report suspected criminal conduct to appropriate authorities.

18. Remediation

Where exploitation is identified, the company will seek to protect affected individuals and address the underlying problem. Remediation may include safeguarding, support, correcting employment practices, recovering wages where appropriate, corrective action by suppliers, ending non-compliant relationships and reporting matters to authorities. A victim-centred approach will be used wherever appropriate.

19. Training and Awareness

Relevant personnel will receive appropriate awareness or training covering modern slavery, trafficking, forced labour, child labour, indicators of exploitation, recruitment and supply-chain risks, reporting, whistleblowing, safeguarding and escalation procedures. Additional training may be provided to procurement, recruitment, contract and site management personnel.

20. Employee Responsibilities

Employees must treat workers respectfully, never participate in exploitation, never threaten or coerce workers, report suspected modern slavery, follow company procedures and cooperate with investigations. Managers have additional responsibility to remain alert to risks on teams and project sites.

21. Management Responsibilities

The Directors are responsible for leadership, implementation, communication, risk review, proportionate supplier monitoring, investigation of concerns, corrective action, training and annual review of this policy.

22. Supply Chain Monitoring

Monitoring may include supplier questionnaires, declarations, contract reviews, site visits, documentation checks, worker interviews where appropriate, complaint reviews, recruitment checks and reassessment of higher-risk suppliers. Monitoring will be proportionate to identified risk.

23. Record Keeping

Appropriate records may include supplier assessments, subcontractor assessments, training records, declarations, reported concerns, investigations, corrective actions and policy reviews. Records will be managed in accordance with applicable confidentiality and data protection requirements.

24. Performance and Key Indicators

The company may monitor training completion, supplier assessments, modern slavery declarations, concerns reported, investigations, corrective actions, higher-risk supplier reviews and escalations. Monitoring is intended to identify opportunities for improvement rather than simply demonstrate compliance.

25. Continuous Improvement

The company will review changes in legislation and guidance, industry risks, supply-chain developments, recruitment practices, concerns, supplier performance, incidents, training effectiveness and audit findings, implementing improvements where identified.

26. Policy Breaches

Failure to comply may result in disciplinary action for employees, subject to company procedures and law. For suppliers and subcontractors, breaches may lead to corrective action, increased monitoring, suspension, removal from approved status, contract termination or referral to authorities where appropriate.

27. Annual Modern Slavery Statement

Where a statutory Section 54 statement is required, the company will publish an annual statement covering organisational structure and supply chains, policies, risk assessment and management, due diligence and remediation, training, and monitoring and effectiveness. The statement will be approved and signed in accordance with applicable requirements.

28. Company Declaration

J J E Electrical Contractors Ltd, part of the J J E Group, has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting responsibly, ethically and transparently and to taking reasonable and proportionate steps to identify, prevent, mitigate and address modern slavery risks within our business and supply chains.

29. Policy Review

This policy shall be reviewed at least annually, following significant legislative changes, serious concerns, major supply-chain changes, significant changes in business activities, or where an audit identifies a need for improvement.