Hale / SO MODULAR	**Modern Slavery & Human Trafficking Statement**	Issue No	01
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Introduction

JG Hale Group Ltd, based in Neath, South Wales, specialises in the design and delivery of major construction projects for Local Authorities, Housing Associations, private building and commercial markets across Wales and the Southwest of England. Our subsidiary, SO Modular Ltd, designs and manufactures timber and modular structures, with erection undertaken through subcontracted services, for these same markets. To deliver our core services, we directly employ in excess of 80 individuals and work with trusted supply chain partners, subcontractors, and employability and training providers.

This statement demonstrates the Group's ongoing commitments towards eradicating the risk of slavery and human trafficking within its organisation and wider supply chains.

Modern Slavery and Human Trafficking are defined as the recruitment, movement, harbouring, or receiving of any person through the use of coercion, force, abuse of vulnerability, deception, or other means, for the purpose of exploitation.

Group Approach towards Human Trafficking and Modern Slavery

JG Hale has a zero-tolerance approach to all forms of slavery and is committed towards ensuring our practices combat slavery and human trafficking within our business and supply chains by undertaking stringent precautionary measures. We are committed towards our efforts to comply with the **Modern Slavery Act (2015),** by implementing and promoting ethical business practices to protect workers within the organisation, and across our entire supply chain, from being exploited and abused.

We recognise our collective responsibility for safeguarding and protecting individuals who may be at risk, across our business and entire supply chain. All HR and Procurement personnel will receive training around the Modern Slavery Act (2015), to raise awareness across the Group, and ensure its compliance.

This approach is underpinned by our five business pillars:

- To respect basic human rights and ensure that we and our supply chain conform to the Modern Slavery Act 2015.
- To treat employees fairly and equitably.
- To operate ethically and with integrity.
- To sustain the environment for the future.
- To be a caring neighbour in our communities.

Policy for Modern Slavery and Human Trafficking

This policy sets out the procedures taken by JG Hale Group Ltd, to ensure that our business operates in compliance with the Modern Slavery Act (2015). This policy does not form part of any employee's contract of employment and we may amend and update at any time.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in

common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

JG Hale Group Ltd has a zero-tolerance approach towards modern slavery and pledge to act ethically and with integrity across all business operations and relationships. We are committed towards implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within JG Hale Group Ltd or across any of our supply chains.
In carrying out our operations we have a transparent procurement system that recognises that Modern Slavery is a complex supply chain issue. We have implemented stringent processes to ensure, as far as is reasonably practicable, our supply chain adheres to our expectations in respect of their workforce.

Compliance with the policy
You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify a Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with a Director.

We aim to foster a culture of openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed towards ensuring that no individual suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery or human trafficking (in any form), is or may be taking place within any part of our own business or across any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Communication and awareness of this policy
Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for JG Hale Group Ltd and will be provided as necessary.

As a business, we use only utilise reputable employment agencies to source labour. Each employment and training provider is vetted during the procurement process to ensure compliance with the Modern Slavery Act (2015). More details surrounding our Procurement Policies are available upon request.

Monitoring and Effectiveness

JG Hale Group Ltd monitors the effectiveness of the measures taken to prevent modern slavery and human trafficking within its business and supply chains. This includes consideration of appropriate performance indicators such as reported concerns or identified cases, relevant training and awareness, and the effectiveness of our recruitment, procurement and supply chain processes.

Any concerns or areas for improvement identified will be reviewed and appropriate action taken where necessary. The effectiveness of these measures will also be considered as part of the annual review of this statement.

Breaches of this policy
Any directly employed employee who breeched this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and/or organisations working on our behalf, if they are found to be in breach of this policy.

Annual Statement
There were no identified or reported cased of Modern Slavery or Human Trafficking within the reporting period identified. This report will be updated annually; providing a statement on the last year.

Reviewed by: Managing Director

Signed: Lee Dunsford

Dated: 14.09.2026

New Review Date: 14.09.2027