

John Henry Group		Modern Slavery Statement 2023	
Reference Number: POL-JHG-PR001		Version Number: 2	
Document Date: November 2019		Review Date: June 2025	
Document Owner: Head of People/Procurement		Approved By: Managing Director	

Introduction

John Henry Group Limited is committed to maintaining and improving our operating activities in support of our zero-tolerance approach taken on all forms of modern slavery and our continued compliance with the Modern Slavery Act 2015. This statement sets out the steps that we have taken during the financial year ending 31st January 2025, to identify and prevent modern slavery in our business and across our supply chains.

Company Overview

John Henry Group Limited delivers specialist, tier 1 telecoms infrastructure services to the major network operators in the UK Telecoms market.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we are absolutely committed to preventing all forms of modern slavery across all of our business operations.

Our principles and policies

We are committed to providing fair working conditions and prohibiting forced labour, child labour and other illegal labour practices. We have a range of policies including, Prevention of Modern Slavery, Anti-bribery and Corruption, and a Whistleblowing policy to ensure the continual implementation of our zero-tolerance approach within our business and across our supply chain.

Due diligence processes for slavery and human trafficking

We have a risk-based approach to due diligence, and prioritise our efforts and resources based on the potential level of risk in our supply chains and encourage all our workers to talk to us if they have reason to be concerned.

Supplier adherence to our values

We will deal with all actual and potential suppliers and contractors fairly, equally, and objectively. We will work with our suppliers in an open and honest way and strive to treat others in the way that we would expect to be treated ourselves. We value strong and productive relationships and where issues arise, we will work with suppliers to overcome difficulties. Our commitment is to ensure Modern Slavery statements are reviewed annually and recorded for all suppliers where our annual spend with them exceeds £50,000, we currently have an IT project progressing to ensure we have a secure location to store and retrieve this information.

We adhere to the principles of the International Labour Organisation Conventions on Labour and Human Rights and expect our suppliers to do the same.

If we become aware of an issue considered to be related to any form of modern slavery within our supply chain, we will share our concerns with the Supplier. If we are not reasonably satisfied with the response of the Supplier, we will formally write to the Supplier outlining our concerns and request the Supplier submit a detailed response in respect of the concern raised. We may request of the Supplier an improvement plan to resolve the issue identified in the timescale dictated by us.

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Ultimately, in support of our zero-tolerance approach, we reserve the right to terminate our contract with Suppliers who fall short of the standards laid out in the Modern Slavery Act 2015.

Training

John Henry Group runs an annual programme of training for all employees on relevant legislation including modern slavery to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business. This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 (a UK Act of Parliament) and constitutes our slavery and human trafficking statement for the financial year ended 31st January 2025.

Natalie Keogh

Managing Director
For and on behalf of John Henry Group