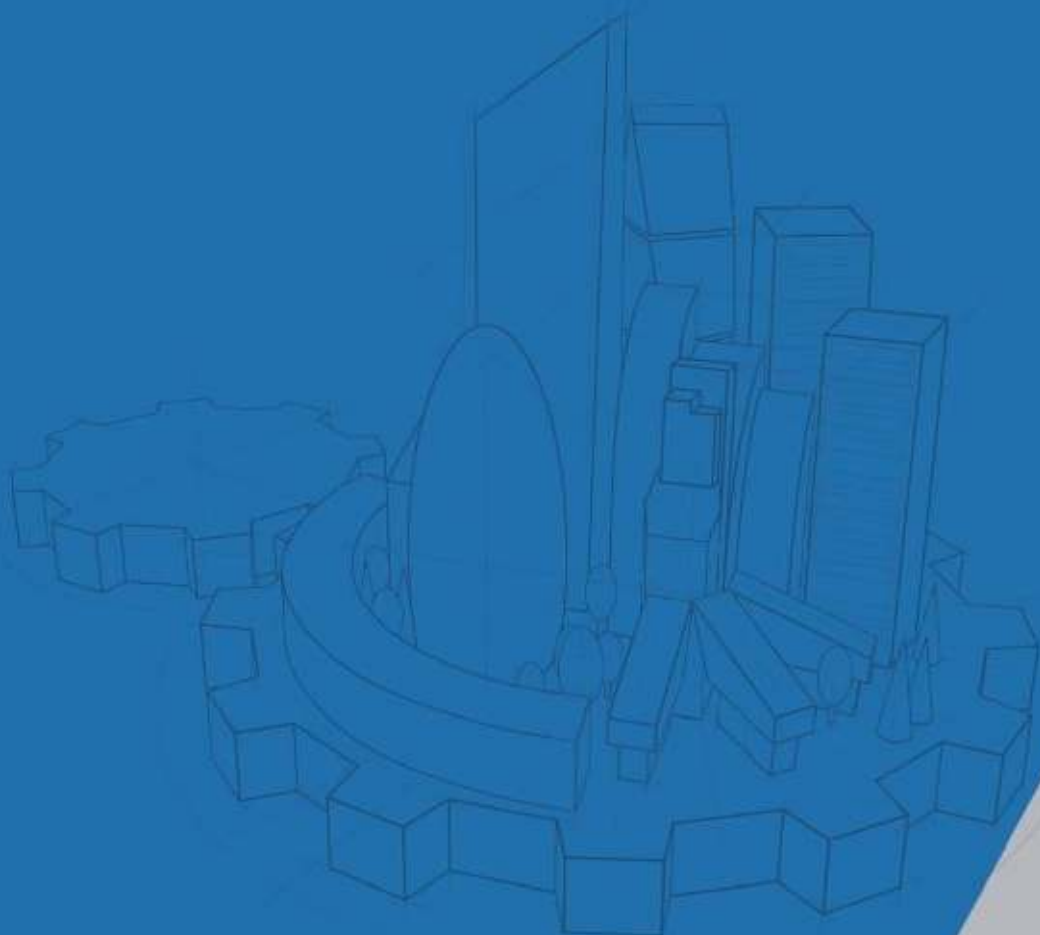




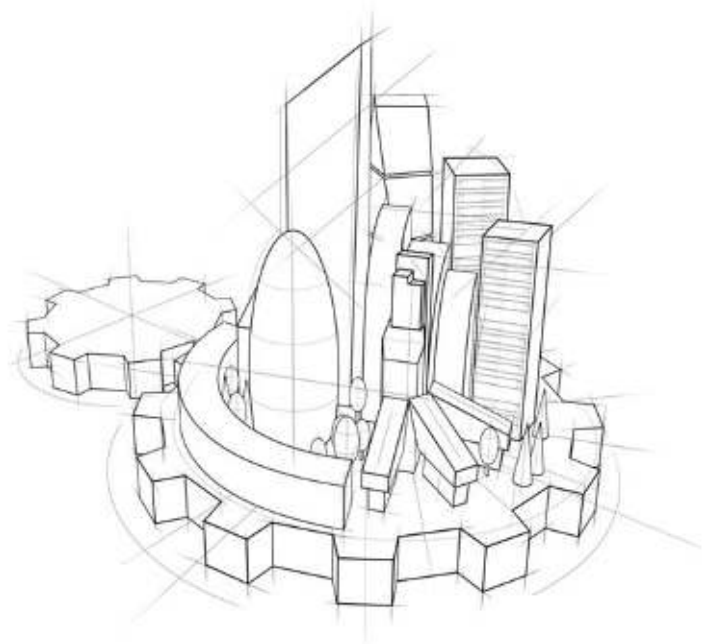
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Engineering Projects | Service & Maintenance | Interior Fit Out | Professional Services

Annual
Anti-Slavery
Statement



Annual Anti-Slavery Statement



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JCA ENGINEERING LTD

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This statement is made on behalf of JCA Head Co Limited, JCA HQ Group Holdings Limited and JCA Engineering Limited

Introduction from Tom Absalom, Managing Director of JCA Engineering Limited

We, at JCA Engineering Limited (and the group of companies to which we belong), recognise the risks that modern day slavery poses to affected workers, their families, communities and globally and are proud of the steps we have taken to combat slavery and human trafficking. It is vital that people around the world can work under safe, fair and legal conditions and so we are committed to continuous improvement within our industry and are making significant efforts to understand our supply chain (of every tier) so that we will not become unwitting participants in slavery. We promote our ethos of providing quality services, delivered safely, fairly and professionally.

Who We Are

We are a provider of design and construction services in the mechanical and electrical, construction and fit-out sectors and a provider of buildings maintenance services. We have strong teams that pride themselves in delivering quality services throughout the lifecycle of a project, from concept, design, construction and then maintenance of an asset. JCA Engineering Limited is a company with its head office in the United Kingdom and is part of the JCA group of companies. Our ultimate parent company is JCA Head Co Limited. JCA Head Co Limited and its subsidiary companies have their head office in Stevenage in the United Kingdom.

Our Business

Our business is organised into four business units:

- Projects division
- Maintenance services division
- Professional design services division
- Fit-out division

Our Supply Chains

Our supply chains include:

- Materials, equipment and plant suppliers
- Maintenance and construction sub-contractors
- Professional consultants

We have a network of suppliers who support us both operationally and in our supply of goods and services. Our supply chains are predominantly UK based.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our [Anti-Slavery Policy](#) reflects our commitment to acting ethically and with integrity in all our business

relationships and to implementing and enforcing effective systems and controls to do our best to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We work with our employees and with our supply chains to ensure that this is the case.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we have considered the nature of our supply chain in order to identify risks and have asked members of that supply chain to make a commitment to us that anti-slavery measures are in place within their respective organisations and that each will comply with our own policy.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier Adherence to our Values and Ethics

We have zero tolerance to slavery and human trafficking. To ensure that our supply chain and contractors comply with our ethics we have in place a supply chain compliance programme. This consists of checks at pre-qualification stage of the measures that organisations have in place to combat modern slavery. In order to become an approved supplier to our business, a supplier must demonstrate and commit to a zero tolerance approach to modern slavery.

We have a compliance team, which consists of involvement from the following departments:

- Legal
- Procurement
- The Board of Directors

At JCA we have standard requirements which must be incorporated into our contracts with our supply chain, obliging suppliers to comply with Anti-Slavery legislation. The sanction for breach is termination of the contract.

Awareness

We expect all of our own staff to uphold our legal and ethical obligations. Our Anti-Slavery Policy was publicised internally when first issued and is made available to all new staff upon joining the business. To reinforce the message, in line with the publication of this statement, a publication has been made on the JCA intranet to draw the attention of all staff to the commitment JCA holds to this statement and the role everyone must play in supporting this commitment. A training video appears on our intranet so that our staff have an awareness of signs of slavery and how to communicate any concerns that they may have. As part of every new staff member's induction to the business, they are required to take part in the online training.

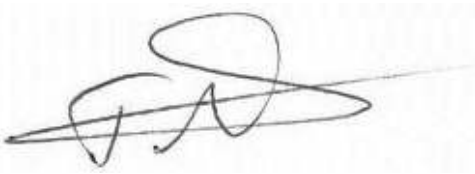
The Board and senior management team are committed to enforcing our Anti-Slavery practices so that we can play our part in ensuring that modern slavery and human trafficking do not take place in our community.

Ongoing Commitment

We appreciate that the risk of slavery and human trafficking can change over time. This being the case, Tom Absalom, our Managing Director, will review our policies regularly and update our processes where needed.

This statement applies to all applicable companies in the JCA group (meaning companies with JCA Head Co Limited as parent company), including JCA HQ Group Holdings Limited and JCA Engineering Limited.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's 2019 slavery and human trafficking statement. It was approved by the Board on 20 June 2019.



Tom Absalom

Managing Director

JCA Engineering Limited

Date: 20th June 2019