



MODERN SLAVERY STATEMENT

JDC Building Works Ltd

Introduction

JDC Building Works Ltd is committed to preventing modern slavery and human trafficking in all aspects of our business and supply chain. We recognise our responsibility under the Modern Slavery Act 2015 and strive to act ethically and with integrity in all our operations.

JDC Building Works recognise that slavery and human trafficking are significant human rights issues and are committed to taking appropriate and proportionate steps to mitigating the risk of these occurring within our business and our supply chain.

JDC are committed to acting ethically and with integrity in all our business dealings, and to maintain & develop systems to ensure modern slavery and human trafficking is not taking place within our business or across our supply chain.

We encourage any employee or third party to confidentially raise a concern and report suspected breaches of these policies.

As a Principal Contractor, the key areas of our operation that could be affected by slavery and human trafficking are our directly hired employees, subcontractor operatives working on our sites, and the workforce of our supply chain who supply materials to our business.

Our Business

JDC Building Works Ltd is a construction company based in the Northern Ireland, providing the design, manufacturing and installation of prefabricated modular buildings. We work with a range of subcontractors, suppliers, and labour providers.

Organisation Overview: JDC Building Works Ltd

- **Company Name:** JDC Building Works Ltd
- **Registered Address:** 4A Flo Road, Cookstown, Co Tyrone, BT80 9HZ, United Kingdom
- **Company Number:** NI657280
- **Incorporated:** 21 November 2018



- **Business Type:** Private Limited Company

Core Operations

JDC Building Works Ltd specialises in **modular building systems**, offering tailored construction solutions for sectors including:

- **Education** – Schools and special education facilities
- **Healthcare** – Clinics and community health centres
- **Commercial** – Office and retail developments
- **Transport and Infrastructure** – Public sector projects

Their modular approach allows for **rapid deployment, cost efficiency, and sustainability**, making them a preferred contractor for government and community project

Geographic Reach

- Operates across **Northern Ireland, Republic of Ireland, and UK.**

Key Supply Chain Components

- **Local Subcontractors** – Electrical, plumbing, and finishing trades hired locally.
- **Material Suppliers** – Timber, steel, insulation, and cladding sourced from NI, ROI and UK vendors.
- **Transport & Logistics** – Regional carriers for module delivery and site setup

Compliance & Ethics

- All suppliers are required to adhere to JDC's Modern Slavery Policy
- Regular audits and vetting ensure ethical labor practices and supply chain transparency
- Contracts include clauses for environmental sustainability and worker welfare

Our Commitment

We are committed to:

- Ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business.
- Implementing and enforcing effective systems and controls to safeguard against any form of modern slavery.



- Promoting transparency and accountability throughout our operations.

Policies and Procedures

To support our commitment, we have implemented the following measures:

- **Supplier Code of Conduct:** All suppliers and subcontractors must comply with our ethical standards, including zero tolerance for forced labour or exploitation.
- **Due Diligence:** We conduct risk assessments and vetting procedures for new suppliers and labour providers.
- **Whistleblowing Policy:** We encourage employees and stakeholders to report concerns confidentially and without fear of retaliation.
- **Training:** Key staff receive training to identify signs of modern slavery and understand reporting procedures.

Risk Assessment and Management

We recognise that the construction industry is at higher risk of labour exploitation. We will regularly assess:

- The geographical location of our projects.
- The nature of subcontracted labour.
- The complexity of our supply chains.

Where risks are identified, we take proactive steps to mitigate them, including audits and supplier engagement.

The steps that we take to mitigate risks in relation to each of these areas are as follows:

- We verify that all employees have the right to work in the UK upon commencement of their employment.
- We make all employees aware of their working hours, leave and absence entitlements and other employment benefits via their Terms of Employment and the Employee Handbook.
- We require all Preferred Supplier List suppliers to ensure their workers have the right to work in the UK, confirm that they do not charge workers a work finding fee



and who have procedures in place to minimise the risk of recruiting forced or compulsory labour.

- We ensure subcontractors confirm their employees have the right to work in the UK.
- We consider sub-contractors' approaches to employee rights and any breaches of human rights related legislation during our selection process.
- We want all sub-contractors that purchase materials for use on our sites to consider the risk of modern slavery in their supply chain.
- We procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK laws on forced labour however where materials are directly sourced from outside of the UK we consider the risk of slavery and human trafficking as part of our selection process.

Training and Capacity Building of Staff Around Modern Slavery

JDC Building Works Ltd recognises that awareness and education are critical in preventing modern slavery and human trafficking. To ensure our staff are equipped to identify and respond to potential risks, we have implemented the following training and capacity-building initiatives:

- **Induction Training:** All new employees receive training on our ethical policies, including modern slavery awareness, during their onboarding process.
- **Annual Refresher Training:** Staff across all departments participate in yearly training sessions that reinforce understanding of modern slavery risks and reporting procedures.
- **Role-Specific Guidance:** Procurement, site management, and HR teams receive tailored training to help them identify red flags in supply chains, recruitment, and subcontractor practices.
- **Third-Party Engagement:** We encourage our suppliers and subcontractors to undertake similar training and share best practices to ensure alignment across our value chain.

Monitoring and Review

This policy is reviewed annually and updated as necessary to reflect changes in legislation, industry standards, and our business operations. We monitor compliance through internal audits and supplier feedback.

Key Performance Indicators (KPIs) to Measure Progress

To monitor our effectiveness in tackling modern slavery, JDC Building Works Ltd uses the following KPIs:

KPI Description	Measurement Frequency	Target
Percentage of staff trained on modern slavery	Annually	100%
Number of supplier audits conducted with ethical compliance checks	6 monthly	Minimum 10
Percentage of suppliers who have signed our Ethical Code of Conduct	Annually	90%+
Number of reported concerns or incidents related to modern slavery	Ongoing	ZERO TOLERANCE
Corrective actions taken following any non-compliance finding	As Required	100% resolution within 30 days

Reporting Concerns

Any concerns related to modern slavery or unethical practices can be reported to our Compliance Manager:

Nicole Quinn

nicole@jdcbuildingworks.com

028 8675 1697

This statement is reviewed by Frank McGurk (Director) and the Senior Management team every 12 months. Last Reviewed & Approved: Monday 6th October 2025.

Next statement Review: October 2026.

Signed



A handwritten signature in dark ink, appearing to read 'F McGurk', on a light-colored rectangular background.

Frank McGurk

Director

06/10/2025