

Code of Conduct

Working with our Supply Chain



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Message from Jeremy Benn, Executive Chair of JBA Group Limited

JBA has always striven to work closely with its suppliers and sub-contractors to help us provide the services and equipment our clients need. We see this as a partnership and one we hope will grow and strengthen with time. We all work in an ever more complex and demanding world, where technical excellence alone is not sufficient to deliver truly sustainable services. Our quality client base expects the highest standards of project governance and integrity. This document is to help you help us in delivering on these requirements and your help and feedback is much appreciated.

Document purpose and scope

JBA Group is committed to ensuring compliance with the highest legal and ethical standards. This must be reflected in every aspect of the way we operate, and we expect the same from those we work with. This document outlines our core values and the minimum standards of conduct we expect from our suppliers, sub-consultants, sub-contractors and other third parties working with or on behalf of JBA.

The review interval for this document is 3 years, or more frequently if significant changes occur.

Review

This document was approved by the Board of JBA Group Limited on 16/12/2024.

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1 Anti-Bribery and Corrupt Practices

Our Principle: We conduct our business in an open and honest way, and we will not be party to corruption or bribery in any form.

Bribery and corruption are criminal offences. They harm the societies in which these acts are committed and distort economic growth and development.

What does this mean for JBA?

We are committed to applying the highest legal and ethical standards in every aspect of the way we operate. We conduct business in an open and honest way. We will not be party to corruption or bribery in any form, whether to obtain an advantage or to disadvantage our customers or competitors or for any other reason.

What do we expect from our suppliers?

We expect our business partners, suppliers and sub-contractors to operate in accordance with our principles. We operate a “zero tolerance” approach to acts of bribery and corruption in anyone employed by, or working on behalf of, JBA.

If there is an attempt to bribe you, or an attempt to make you engage in fraudulent or corrupt business practices you must tell us immediately. In particular, you must not engage in:

- Giving or receiving gifts or payments or other inducements to obtain business or gain an advantage;
- Dishonest practices such as cartels, money laundering, or fraud;
- Making or receiving payments to facilitate performance of existing duties.

2 Artificial Intelligence (AI)

Our Principle: We are committed to acting responsibly in our use of AI (including AI developed by JBA or by third parties).

Artificial intelligence (AI) plays a vital role in enhancing our business operations and decision-making processes, but it is essential that AI development, use and deployment aligns with our values, legal obligations, and ethical standards.

What does this mean for JBA?

Our use of AI will comply with all legislation, standards, statutory and other obligations and best practices that are relevant to our activities and the jurisdictions in which we operate. This will include, but not be limited to, data protection, intellectual property, and anti-discrimination laws.

We will

- train our employees who are involved in AI
- implement robust safeguards and security measures to prevent unauthorised access of our AI technology
- adhere to ethical standards, avoid bias, discrimination and harm to individuals or communities, promote fairness and inclusivity
- be transparent about our AI use in decision-making processes, reporting and project work
- establish clear ownership and accountability for our AI use
- review and report compliance with our policy and principles.

What do we expect from our suppliers?

We expect our business partners, suppliers and sub-contractors to operate in accordance with our principles.

3 Avoiding Anti-Competitive Behaviour

Our Principle: We believe in open and fair competition and will not be party to prohibited anti-competitive practices in any form even where, if we did, we might obtain a business advantage.

We all benefit from economic environments in which competition thrives. Anti-competitive practices limit opportunities, economic growth and development.

What does this mean for JBA?

Reputation is a key factor in our success. We will not be party to prohibited anti-competitive practices in any form. We will not infringe competition law but will maintain our high ethical standards and thereby protect our reputation. Our company values and culture emphasise fair competition and integrity and we expect our partners and others we work with to uphold these same standards. Engaging in any anti-competitive activities exposes all those involved to legal and operational risks, adverse publicity and serious reputational damage.

What do we expect from our suppliers?

Never engage in anti-competitive behaviours such as:

- bid rigging;
- price fixing; or
- exclusivity supply arrangements relating to products, territories or customers.

We comply with competition laws wherever we are working, and we expect you to do the same. If you suspect anti-competitive behaviour, it should always be reported to us.

4 Biosecurity

Our Principle: We believe everyone has a responsibility to protect the natural environment and work to minimise the risk of harm caused by biosecurity threats.

Biosecurity procedures and measures are designed to protect the natural environment against harmful organisms, such as invasive non-native species, plant and animal pests and diseases.

What does this mean for JBA?

Effective biosecurity measures are vital in demonstrating to our staff, the public, our clients and our suppliers that we take our corporate responsibility seriously and care about the environment. We comply with all legislation, standards, statutory and other obligations and best practices that are relevant to our activities and the jurisdictions in which we operate. We provide instruction, training, resources and support needed to our staff and partners in order to effectively implement our Biosecurity Policy.

What do we expect from our suppliers?

We expect you to do the same.

Our Biosecurity Policy applies equally to our suppliers, sub-contractors and sub-consultants to help reduce and minimise the risk of causing harm. We follow guidance such as the 'Check, Clean, Dry' campaign¹ and expect our partners to follow similar, as appropriate to the jurisdictions in which we operate.

We expect our partners to have in place biosecurity procedures appropriate to the prevailing hazards and consistent with differing levels of risk.

¹ promoted in the UK by Department for Environment, Food and Rural Affairs' (Defra)

5 Corporate Responsibility - our wider responsibilities

Our Principle: We care about the environment, communities, and individuals. We are committed to meeting our social, economic and environmental responsibilities.

We aim for our operations to create social value and have a positive impact on communities and the environment. We are committed to **The Ten Principles of the UN Global Compact** and acting responsibly in all aspects of the areas of human rights, labour, environment and anti-corruption.

What does this mean for JBA?

We work hard to find a balance between the financial sustainability of JBA as a business and our wider ethical aspirations and responsibilities. We are committed to honesty, transparency, and upholding the highest moral and ethical standards in all our interactions. Through our service provision, purchasing, charitable activities and business culture we support initiatives to promote environmental sustainability, social inclusion and diversity and encourage our staff to consider how we as a company and they as individuals can improve our local communities.

What do we expect from our suppliers?

We expect anyone working with us to commit to our goals of:

- Improving our environmental performance and promoting environmental sustainability;
- Encouraging social inclusion and diversity;
- Recognising the value of local communities and respecting the laws and traditions of those communities wherever we are operating;
- Building positive relationships with local communities; and
- Making a positive contribution through the services we provide and encouraging participation, interaction and engagement.

6 Customer Care

Our Principle: We are committed to providing exceptional service and we set clear standards for customer care. We aim to provide all parties with the highest standards of service and to enhance customer satisfaction.

Excellent customer service is key to our success and reputation, and that of our partners and suppliers.

What does this mean for JBA?

We work within a set of principles that benefit all interested parties: we work collaboratively, embrace challenge, and we innovate. We aim to create cutting edge solutions and be a partner or supplier of choice.

We communicate clearly and promptly, act in a professional and courteous manner, and look after client data in a secure and responsible manner in accordance with any relevant privacy policy.

We monitor client satisfaction and provide multiple access points for enquiries, commendations or complaints from our clients, suppliers and other interested parties, including the public. We deal with any complaints efficiently and swiftly, and keep customers informed of changes or updates that might affect them.

What do we expect from our suppliers?

The performance of our suppliers and partners contributes to, and reflects on, our performance and so we expect our suppliers and partners to provide similarly high levels of customer care when working with us and on our projects, including dealing with complaints efficiently and swiftly.

7 Dignity at Work: Inclusion, Diversity, Bullying, Harassment, Discrimination

Our Principle: We are committed to providing a working environment that is free from harassment, bullying and threatening or violent behaviour where everyone is treated with dignity and respect and without discrimination. Providing equal opportunities to all and valuing and celebrating our diversity is central to our inclusive culture.

We recognise that everyone brings their own unique capabilities, experiences and characteristics to their work and we value this diversity. Harassment, bullying and threatening or violent behaviour are never acceptable.

What does this mean for JBA?

We understand that harassment, bullying and threatening or violent behaviour can have very serious consequences for individuals and the organisation and so we promote a working environment that is free from these actions. We take these issues very seriously and will investigate any complaints or accusations related to them.

We comply with all legislation, standards, statutory and other obligations, and best practice in the jurisdictions in which we operate. We are committed to the application of equality legislation, in principle and practice, and will not discriminate on any of the grounds or protected characterisation identified in equality legislation relevant to the jurisdictions in which we work. We look for opportunities to maximise diversity and inclusion wherever possible.

What do we expect from our suppliers?

We are committed to creating a working environment in which everyone is respected and if you work with us, we expect you to uphold this principle and to comply with all relevant legislation and guidance.

We will not tolerate bullying, harassment or threatening or violent behaviour by our managers, employees or those we work with. We expect such behaviour to be challenged and reported and we will support those who do this. We expect those we work with to uphold the principles of equality, inclusion and diversity.

8 Finance

Our Principle: We are committed to managing the finances of JBA accurately, effectively and efficiently and to paying our staff and suppliers promptly and fairly.

Accurate financial data, and effective and efficient financial procedures, managed in line with Accounting Standards, are essential to maintaining a successful business.

What does this mean for JBA?

Our Finance Team provide accurate financial data to inform decisions about the future direction of the company.

We are signed up to the prompt payment code, confirming that we will process and settle invoices quickly and efficiently.

We pay all our staff at or above the National Minimum/Living wage in accordance with UK government guidance or its equivalent in other countries. We pay all permanent staff at or above the Real Living wage in accordance with guidance from the Living Wage Foundation (UK) or its equivalent in other countries.

We comply with all legislation, standards, statutory and other obligations, and best practice in the jurisdictions in which we operate.

What do we expect from our suppliers?

We expect suppliers to provide accurate and timely invoices and other financial records.

We require our suppliers to pay at least the legal minimum wage in the countries where they operate.

9 Health and Safety

Our Principle: We are committed to the proactive management of health, safety, welfare and wellbeing for all our employees, sub-contractors, sub-consultants, visitors and others so that they are not compromised as a result of our activities or undertakings.

All workers should be provided with a safe and healthy working environment in which appropriate welfare arrangements are available, activities are free from risk and do not place anyone in harm.

What does this mean for JBA?

We aim to achieve continual improvement in our health and safety performance and engagement. We promote a positive health and safety culture throughout JBA to drive higher standards and provide all necessary information, instruction, training and supervision to meet our policy aims to both employees and anyone working on our behalf. Prevention is better and cheaper than cure: profits and safety are not in competition and safety is good for business.

What do we expect from our suppliers?

We expect you to share our commitment to maintaining the highest standards of health and safety including:

- Having your own robust health, safety, welfare and wellbeing management systems in place;
- Reporting any unsafe working conditions or health and safety incidents and being willing to immediately stop working if necessary;
- Having processes in place to actively identify hazards and risks; and
- Complying with all health, safety, welfare and wellbeing legislation, standards, statutory and other obligations and best practices that are relevant to our activities and the jurisdictions in which we operate.

10 Information Security and Data Protection

Our Principle: We hold ourselves to the highest standards in managing, storing and protecting data and information, including personal data, and will not accept the mishandling of any data.

Security incidents and data breaches present financial, legal, service delivery, ethical and reputational risks. The potential disruption caused to a business can ultimately result in its failure.

What does this mean for JBA?

We conduct our operations in line with all relevant legislation, other obligations, and best practice to ensure we maintain the highest standards of information security and data protection. We manage and control our information security risks to protect and preserve the confidentiality, integrity and availability of information.

We recognise that personal data belongs to the individual data subject, not to JBA, and that our misuse or failure to protect the personal data that we collect, store, use or share may result in an adverse effect on the rights and freedoms of data subjects. It has the potential to expose JBA (and its employees) to operational and legal risks, adverse publicity, and reputational damage.

What do we expect from our suppliers?

We expect you to maintain information management systems that comply with all legislation and standards relevant to your activities in the jurisdictions you may be operating in on our behalf. We take care to look after personal data in a responsible manner and in accordance with legal and best practice, and we expect you to do the same. We will look for evidence that your information management systems are in line with our own key principles:

- Top management commitment;
- Privacy by design and default;
- Proportionate processes and procedures;
- Risk assessments (including data privacy impact assessments and legitimate interest assessments);
- Communication and training; and
- Monitoring and review.

11 Modern Slavery and Human Trafficking

Our Principle: We respect and uphold human rights. We take a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships.

Modern slavery is a crime and a violation of fundamental human rights in whatever form it takes – slavery, servitude, forced and compulsory labour or human trafficking.

What does this mean for JBA?

We have a culture of openness in JBA and encourage any concerns or breaches of our policies to be reported. Our Whistleblowing Policy protects anyone who highlights a risk of modern slavery or human trafficking within our business or supply chain.

We check the eligibility of employees and sub-contractors to work in the relevant country and we require service providers to confirm that modern slavery and human trafficking practices do not take place in their organisation. We will investigate any concerns and may terminate a relationship with a supplier if they fail to comply with our policy or agree to an audit.

What do we expect from our suppliers?

We require that you uphold and comply with all relevant legislation and best practice guidance regarding modern slavery and human trafficking. We expect you to be able to confirm the steps you are taking to ensure modern slavery and labour exploitation are not taking place in your business or any part of your supply chain; and you must maintain a complete set of records in relation to your supply chain of all goods and services provided to JBA.

12 Net Zero

Our Principle: We are committed to becoming a Net Zero carbon emissions business.

We recognise that we are in a climate and ecological emergency, and we are committed to taking meaningful action to minimise the impacts of our activities on the climate.

What does this mean for JBA?

To support our commitment, we have set science-based emissions reduction targets through the Science Based Targets initiative (SBTi). By joining the SBTi, we ensure that our approach to reducing our greenhouse gas emissions is aligned with what climate science says is necessary to keep global warming below 1.5°C. Achieving our Net Zero objective is vital to maintaining the long-term success of JBA.

We take all reasonable measures to minimise our carbon emissions in-line with our science-based emissions reduction targets. We work closely with our suppliers to minimise the carbon emissions of the work they undertake for JBA. This includes providing advice and tools to help our suppliers establish carbon emissions reduction targets and to measure and monitor their carbon emissions. We prioritise suppliers who support our Net Zero objective.

What do we expect from our suppliers?

We require our suppliers, sub-consultants and sub-contractors to support our Net Zero objective by reducing the climate impacts of the work they undertake for JBA.

We expect you to have set a target to reduce your carbon emissions and to be able to demonstrate that you are working progressively towards achieving your target. We expect you to measure and monitor your carbon emissions and confirm the carbon footprint of the work you undertake for JBA.

13 Quality

Our Principle: We look for continual improvement in the efficiency and effectiveness of our operations to help us consistently provide high quality services that meet or exceed the expectations of our clients.

Our reputation has been built on the high quality of the services we provide. The quality of the inputs our partners, suppliers, sub consultants and sub-contractors provide is vital to maintaining this success.

What does this mean for JBA?

We maintain a process-based quality management system that enables us to provide services that consistently meet client and other applicable statutory and regulatory requirements.

Our quality management system includes processes and procedures to define how we work and to ensure we have appropriate checks and reviews in place. We identify objectives to help focus our improvements and we use monitoring and measuring systems to track our performance.

What do we expect from our suppliers?

We expect you to have appropriate planning, check, review, monitoring and management processes in place to ensure that any services or deliverables you provide to, or on behalf of, JBA meet the required quality.

14 Sustainability and Environmental Management

Our Principle: Our core aim is to have a positive impact on our employees, clients, suppliers, and the local communities and environments in which we work. We are committed to championing sustainability within all our operations and client services and to promoting sustainability in all our policies, plans, and business management decisions.

We recognise that our environmental, social, and economic responsibilities are integral to the long-term success of our business.

What does this mean for JBA?

We take all reasonable measures to minimise the environmental impacts of our operations and activities and ensure our use of natural resources is sustainable and environmentally responsible. We work progressively to improve the sustainability of our business practices and to become a Net Zero carbon emissions business.

We engage with our staff, clients and suppliers to promote environmental sustainability and proactively share what we learn. We work with our suppliers to minimise the environmental impacts of the goods and services we purchase across their full life cycle, including disposal and encourage you to contact us should you have any questions regarding our sustainability goals or would like support from us to implement them. We apply sustainability as a positive choice and prioritise suppliers who support our sustainability objectives.

What do we expect from our suppliers?

We require that you uphold and comply with all relevant environmental legislation and standards and best practices that are relevant to your activities.

We expect anyone working with us to commit to the following sustainability goals:

- Work progressively to improve the environmental performance of your business practices;
- Take all reasonable measures to minimise the environmental impacts of your operations and activities;
- Ensure your use of natural resources is sustainable and environmentally responsible;
- Implement measures to reduce your energy use and associated GHG emissions;
- Apply the principles of a circular economy in your services and in the goods and services you use;
- Maintain high standards of biosecurity in your offices, sites, and field operations; and
- Make a positive contribution to the local communities in which you work through the services you provide and seek opportunities to enhance social value.

15 Whistleblowing

Our Principle: We are all responsible for raising concerns about wrongdoings or illegal acts in the workplace and we must promote a working environment that enables people to do this with confidence and security.

Whistleblowing encourages and enables employees to raise serious concerns within an organisation rather than overlooking a problem or raising their concerns to persons outside the Group.

What does this mean for JBA?

JBA is committed to the highest possible standards of openness, probity and accountability. In line with this commitment, we expect everyone who works for or with us, who may have serious concerns about any aspect of our or our suppliers' work to come forward and voice those concerns.

We will support anyone who raises a concern in good faith either about JBA or any of our suppliers or contractors and will follow up these concerns discreetly. We always support an individual for doing the right thing. We will not tolerate any retaliation or discrimination of any kind against anyone who has raised an issue in good faith.

What do we expect from our suppliers?

If you have a concern that one or more of the following is either happening, has taken place or is likely to take place, you need to speak up:

- A criminal offence, for example fraud.
- The company is breaking the law, for example does not have the right insurance.
- Someone's health and safety is in danger.
- Bullying or harassment.
- Risk or actual damage to the environment.
- A miscarriage of justice.
- Someone is covering up wrongdoing.

We encourage you to raise any concerns or questions you have. We will treat any concerns confidentially.