

Policy on Corporate Social Responsibility



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Document purpose and scope

This document sets out the Corporate Social Responsibility (CSR) Policy of JBA Group Limited and its subsidiary Operating Companies, collectively known as 'JBA'. It covers activities undertaken by the Group throughout all office locations and operations worldwide.

This document will be reviewed for continued suitability, will be communicated within the JBA Group and, if appropriate, made available to interested parties. The review interval for this document is 1 year.

Aim

We understand that the way we run our business has the potential to affect society and our aim is for all companies within the JBA Group to operate as socially and environmentally responsible businesses that make a positive contribution to the local and global communities and environments in which we work.

As a financially stable, safety conscious and innovative family of businesses we aim to provide rewarding and enduring careers for our colleagues, to provide value and high-quality services to our clients and to develop mutually beneficial partnerships with our suppliers.

Policy statement

JBA is 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. We strive to find a balance between the financial sustainability of JBA as a business and our wider responsibilities. We are committed to honesty, transparency, and upholding the highest moral and ethical standards in all our interactions.

We actively support local communities and charities through our service provision, purchasing and charitable activities. We promote local skills and education by providing employment and placement opportunities for local people and disadvantaged people. We measure and report the social value we create and promote social value delivery and measurement to our clients and suppliers.

We take all reasonable measures to minimise the environmental impacts of our business and make sure our use of natural resources is sustainable and environmentally responsible. We recognise that we are in a climate and ecological emergency and are committed to taking meaningful action to minimise our climate impacts.

We maintain safe and welcoming working environments for all our colleagues and support the protection of human rights. We offer equal opportunities for all, actively encourage diversity and inclusion, and protect staff health and wellbeing. Our colleagues have access to abundant support, learning and development throughout their career.

We understand the important contribution our suppliers and partners make to the success of JBA. We aim to develop positive and lasting relationships and offer support to achieve the highest legal, ethical, and environmental standards. We encourage the use of micro-businesses, SMEs (small and medium-sized enterprises), VCSEs (voluntary, community and social enterprises), and local suppliers, so long as they operate in accordance with our policies, and we recognise the benefits this provides to the communities in which we operate.

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.

Responsibilities

The JBA Group Board is responsible for reviewing and approving the content and implementation of this policy and will help each Operating Company to apply this policy through appropriate procedures, guidance, and monitoring.

Overall compliance with the requirements of this policy is the responsibility of each Operating Company within the Group. The Managing Director of each Operating Company will oversee their company's adherence to this policy. Operating Company Directors and Management Teams are responsible for taking measures to promote this policy and help their staff to comply with its requirements.

All staff are required to comply with the policy requirements and share responsibility for our performance in implementing it.

Line managers are required to check that their staff are aware of this policy and any associated guidance. Managers will also be responsible for supporting staff in following through new skills which will develop them in their future work and career.

Implementation

We are committed to JBA having a positive impact. We bring value to society by advancing knowledge and understanding of environmental risk and hazards and we actively support initiatives to promote colleague wellbeing, social value, and environmental sustainability.

Being a good employer and promoting diversity

We provide a healthy and safe working environment, support the mental and physical wellbeing of our colleagues, and operate in accordance with our ISO 45001 certified health and safety management system.

We communicate clearly, concisely and respectfully and have an open-door culture to allow all our colleagues to have an effective voice. We are employee-owned and have elected staff trustees on the JBA Employee Ownership Trust board.

We value diversity and treat everyone with respect, dignity, and fairness, fostering an inclusive and collaborative work environment that is free from discrimination, bullying and harassment. We offer remuneration packages with equal pay and opportunities regardless of gender that reflect qualifications and experience. We pay all our permanent staff at or above the National Minimum/Real Living wage or its equivalent in the countries in which we operate. We encourage our suppliers to do the same.

We abhor the use of slave, illegal child or forced labour (including human trafficking) and record the actions we have taken to avoid this, either directly or through our supply chain, in our **Statement on Modern Slavery and Human Trafficking**.

Being a good partner

We operate in an open and honest way with our colleagues, clients and suppliers. We seek to develop positive and lasting relationships, are focused on ensuring the safety and quality of our services and are committed to clear communication. We seek and respond to the opinions of our colleagues and clients and maintain a **Whistleblowing Policy** for any serious concerns.

Our contracts clearly set out the agreed terms and conditions and we will seek to comply with client policies and codes of practice where required and reasonably possible to do so without conflicting with our own policies or other obligations.

We encourage suppliers to adopt responsible business policies and practices. We pay our suppliers in a timely fashion and operate in accordance with the Prompt Payment Code. We manage our supply chain with accountability and encourage our suppliers to support our objectives and share our commitment to sustainability.

Supporting local communities

We use our diverse and extensive project portfolio to achieve sustainable physical, social and environmental benefits for local communities. We recognise the social and environmental benefits of employing local people. We champion the use of local suppliers in the knowledge that this can make a positive contribution to the wellbeing of local communities. We support our people who take part in local charitable and volunteering activities.

Environmental responsibility

Our **Policy on Sustainability and Environmental Management** explains how we seek to protect the environment by operating in accordance with our ISO 14001 certified Environmental Management System. Our annual **Sustainability and Environmental Reports** record progress against our intention to be a Net Zero carbon emissions business. We support this ambition by working more efficiently, minimising our resource use and the environmental impacts of our resource use. Employees are encouraged to contribute to our environmental

goals and follow environmentally responsible practices in their daily work. We offer preferential approval status to suppliers who support our environmental and sustainability goals and advice to those who wish to improve their own environmental performance. We support our clients to reduce their environmental impacts and use our diverse project portfolio to deliver sustainable development.

Integrity

We employ responsible and accountable business practices that encourage a culture of integrity and responsibility. We apply a zero-tolerance approach to acts of bid-rigging, mis-selling, bribery or corruption by any of our employees, business partners or agents working on our behalf.

Philanthropy

We give financial and other support to the JBA Trust, which supports and promotes scientific research, education, training, and sponsorship in environmental and community risk management. In collaboration with the JBA Trust both collectively and independently, we provide a range of placements, apprenticeships, and other training opportunities. Through our work with the JBA Trust, and more widely, we further our role as a STEM ambassador by raising awareness, creating opportunities and encouraging interest in STEM activities and careers.

Approval

This document was approved by the Board of JBA Group Limited on 10/02/2025.

A handwritten signature in black ink, appearing to read "Jeremy Ben", with a large, stylized initial "J" and a horizontal line extending from the end.

Executive Chair, JBA Group