

Policy on Avoiding Anti-Competitive Behaviour



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Document purpose and scope

This document sets out the Avoiding Anti-Competitive Behaviour 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 3 years.

Aim

This policy, in conjunction with our **Anti-Bribery and Corruption Policy**, aims to help us comply with legal requirements to avoid infringing competition law, thereby avoiding anti-competitive practices, maintaining our high ethical standards and protecting our reputation. Our company values and culture emphasise fair competition and integrity. There are distinct commercial benefits to us acting with integrity. These include improved chances of JBA being selected as a supplier, in both public and private sectors, and maintaining our valuable reputation.

JBA benefits from economic environments in which competition thrives: anti-competitive practices limit opportunities, economic growth and development. Although anti-competitive practices may sometimes appear to be advantageous in the short term, they damage the markets and economies in which we operate, and ultimately would damage us. They would expose JBA (and its employees) to a series of legal and operational risks, adverse publicity and serious reputational damage.

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 are committed to ensuring adherence to the highest legal and ethical standards. This must be reflected in every aspect of the way in which we operate. We must bring integrity to all our dealings.

We will not be party to prohibited anti-competitive practices in any form even where, if we did, we might obtain a business advantage or disadvantage over our customers or competitors.

We will comply with all legislation, standards, statutory and other obligations and best practices which are relevant to our activities and the jurisdictions in which we operate. We expect our business partners, suppliers and sub-contractors to operate in accordance with this policy whilst representing JBA or working on our projects. We will seek to comply with client policies where required and reasonably possible to do so without conflicting with our own policies or other obligations.

Notification of a breach or potential breach of this policy will be reported to senior management and may be escalated to the Chair of the Group Board.

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. The Group Compliance Officer for this policy is the Executive Chair of JBA Group Limited, Jeremy Benn.

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.

Bid managers are responsible for ensuring that this policy and associated guidance is followed when forming consortia and joint ventures for bids and when submitting tenders and seeking invitations to bid.

Business managers are responsible for ensuring that this policy and associated guidance is followed when negotiating and operating contracts, and when dealing with resellers/distributors and competitors.

Line managers are required to check that their staff are aware of this policy and the associated guidance.

All staff are required to comply with our policy requirements and share responsibility for our performance in implementing it. Employees are required to read and understand all aspects of this policy and the associated **Guide to Avoiding Anti-Competitive Behaviour** and abide by them. They need to be sure they know how to raise a concern and how to seek further guidance.

Implementation

We implement this policy by following six principles:

- Proportionate procedures
- Top level commitment
- Risk assessment
- Due diligence
- Communication
- Monitoring and review.

We provide all employees with confidential reporting facilities.

We communicate this policy to all operating companies and employees as well as business partners, individuals and other entities, where appropriate. Those who work in areas within our business identified as being particularly high risk are able to receive additional training and support in identifying and avoiding prohibited anti-competitive practices.

The Group Board applies a “zero tolerance” approach to prohibited anti-competitive practices engaged in by any of our employees or by business partners (including suppliers and resellers) or agents working on our behalf. Any breach of this policy will be regarded as a serious matter and is likely to result in disciplinary action.

Approval

This document was approved by the Board of JBA Group Limited on 17/06/2024.



Executive Chair

JBA Group