

Statement on Modern Slavery and Human Trafficking



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Document purpose and scope

This document sets out the Modern Slavery and Human Trafficking Statement of JBA Group Limited and its subsidiary Operating Companies, collectively known as 'JBA'. It covers activities undertaken by the Group throughout all its office locations and operations worldwide.

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

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.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We take a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships.

We will comply with all local and national laws that are relevant to our activities and the jurisdictions in which we operate. We have HR policies and procedures in place to prevent unethical employment practices and to foster a healthy work life balance, where wellbeing and employee satisfaction are key priorities. All our staff have freedom of movement and association. We prohibit any threat of violence, harassment or intimidation within our work environments. We prohibit the use of worker-paid recruitment fees, child labour, discrimination or the confiscation of workers' original identification documents.

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

Responsibility

Responsibility for our anti-slavery and human trafficking initiatives is as follows:

Policy: The Group Board is responsible for implementing and reviewing this policy statement. It is supported by the Boards of the Operating Companies within the Group and our Group Operations team, which includes those responsible for our HR, Finance, Health and Safety, IT and Integrated Management System functions.



Investigations: The Group Board, supported by our Group Operations team, is responsible for investigations in relation to any known or suspected instances of slavery and human trafficking in order to identify, prevent and mitigate any incidences of modern slavery in our operations and supply chains.

Due diligence

We understand that the Private Sector has an important role to play in helping to end slavery, we support the application of the requirements of the Modern Slavery Act 2015 in the UK, and we follow the UN Guiding Principles on Business and Human Rights across all our operations worldwide.

Members of the Group Board, Operating Company Boards, Senior Management Teams and other key staff are trained in how to identify, report and deal with a breach of this policy. This Statement is regularly disseminated to all staff.

Our Board members and senior staff demonstrate leadership in their commitment to ensure slavery does not take place in JBA by ensuring our policies and employment processes are followed, and that our Human Resources, Health and Safety and Procurement functions are adequately trained and resourced.

We check the eligibility of employees and sub-contractors to work in the countries where they are based.

We require prospective and existing service providers to confirm that modern slavery and human trafficking practices do not take place in their organisations.

It is fundamental to our business ethos, core values and operating principles to identify, prevent and mitigate incidences of modern slavery in our operations.

JBA Group structure

JBA Group consists of the following operating companies:

JBA Group Operating Company	Registration location
Jeremy Benn Associates Limited (trading as JBA Consulting)	England
<i>subsidiary:</i> JBA (IoM) Limited	The Isle of Man
<i>subsidiary:</i> Jeremy Benn Pacific Scientists and Engineers Pty Ltd	Australia
JBA Consulting Engineers and Scientists Limited	Republic of Ireland
<i>subsidiary:</i> JBA Consult Europe SRL	Romania
JBA Risk Management Limited	England
<i>subsidiary:</i> JBA Risk Management Pte Ltd	Singapore
<i>subsidiary:</i> JBA Risk Management Inc.	USA
Mekong Modelling Associates	Cambodia

In the financial year ending 31 October 2022, we directly employed 901 staff worldwide. Our supply chain included organisations and individuals who acted as sub-consultants or sub-contractors to assist in the delivery of our professional services, and we purchased office services and equipment from external suppliers.

Our services

We provide professional consultancy services through our offices in the UK, Ireland, Romania, Singapore, Cambodia, Australia and USA and staff based in the Isle of Man, France, Germany, Italy, Spain, Switzerland, and Sweden.

Our principal areas of operation are specialist consultancy and services in the fields of water and environmental management with clients from many business areas including governmental and non-governmental, private, public and third sector organisations.

Risk assessment and management

We consider that our operations have a very low risk of involvement with modern slavery or human trafficking practices because:

- We use directly employed staff for most of our technical work and we have strong policies and procedures in place to ensure their well-being, fair treatment, and a leading remuneration and welfare package.
- Our staff are typically highly academically qualified and therefore likely to have a choice of jobs and be free to move between job opportunities.
- We purchase goods and services from suppliers with strong ethical and welfare policies and outcomes who are able to confirm that modern slavery and human trafficking practices do not take place in their organisation.

Steps for the prevention of modern slavery

We have a culture of openness in JBA and encourage the reporting of any concerns or breaches of our policies, anonymously if preferred.

We check the eligibility of employees and sub-contractors to work in the countries where they are based. Before employing new staff, we take practical and proportionate steps to reduce risks by carrying out appropriate verification checks. All permanent employees must provide evidence to demonstrate they have the right to work in the country of their employment.

Our supplier assessment processes require prospective and existing service providers to confirm that modern slavery and human trafficking practices do not take place in their organisations. We expect our suppliers to review their own supply chains for compliance with our high standards. We do not rely solely on self-assessment in our supply chain and undertake our own checks and audits. We follow up any reported concerns and may terminate the relationship if a supplier failed to comply with this policy or agree to an audit.

We pay all our permanent staff above the legal minimum wage and the Living Wage, or its equivalent, in the countries in which we operate. We require our suppliers to pay at least the legal minimum wage in the countries where they operate.

We maintain a suite of policies that combine to ensure all JBA business is conducted in an ethical manner and to demonstrate our commitment to being a transparent organisation. All staff are required to read and confirm they have understood the policy content. In particular, our **Whistleblowing Policy** protects anyone who highlights to us any risk of modern slavery or human trafficking within our business or supply chain. Relevant policies are available via our websites and we have recently produced a **Supplier Code of Conduct** to summarise relevant policy requirements to our suppliers.

Our Employee Assistance Programme provides our staff with a secure way of seeking advice about any modern slavery or human trafficking issues affecting them or their families.

Notification of a breach or potential breach of this policy is escalated to the Chair of the Group Board. The Chair will convene a 'task and finish' group, including our Director of Group Operations and HR management, to investigate and report on actions required.

Future improvements

We are committed to ensuring there is no modern slavery or human trafficking in any part of our business and, in so far as is possible, to requiring our suppliers hold a similar ethos. We intend to continue to increase the quantity and scope of our supplier audits.

To support this commitment, we will review and update our existing business policies and will share relevant policies with our supply chain.

We will develop key performance indicators to enable us to measure our progress in tackling modern slavery. These will relate to training, disseminating information to our staff and auditing our suppliers.

Review

This document was approved by the Board of JBA Group Limited on 16/10/2023.



Executive Chair

JBA Group