

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

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. JBA takes a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

Responsibility

Responsibility for JBA's anti-slavery and human trafficking initiatives is as follows:

Policy: The JBA Group Board, supported by the JBA Group Operations function (which includes those responsible for our HR, finance, and Integrated Management System functions) are responsible for implementing and reviewing this policy.

Investigations/due diligence: The Group Board, supported by the Group Operations function are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.

Training: Members of the Group Board and subsidiary company boards are trained in how to identify, report and deal with a breach of this policy. The policy is explained to staff by means of cascade briefings and as part of staff induction.

JBA Group structure

JBA provides professional consultancy services across the world with offices in the UK, Ireland, Isle of Man, Romania, Singapore, Cambodia, Australia and USA and staff based in Germany, Switzerland and Sweden.

JBA Group consists of the following operating companies:

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 Limited	Australia
JBA Consulting Engineers and Scientists Limited	The Republic of Ireland
<i>subsidiary:</i> JBA Consult Europe SRL	Romania
JBA Risk Management Limited	England
<i>subsidiary:</i> JBA Risk Management, Pte	Singapore
<i>subsidiary:</i> JBA Risk Management, Inc.	USA
Mekong Modelling Associates	Cambodia



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In the financial year ending 31 October 2019, we directly employed 644 staff worldwide. Our supply chain included organisations and individuals who acted as sub-consultants to assist in the delivery of our professional services. We also purchased office services and equipment from external suppliers.

Risk management

Our principal areas of operation are specialist consultancy 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.

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 the majority 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;
- 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. Our Whistleblowing Policy was reviewed this year. It protects anyone who highlights to us any risk of modern slavery or human trafficking within our business or supply chain.

We check on the eligibility of employees and sub-contractors to work in the UK and our Approved Supplier process requires service providers to confirm that modern slavery and human trafficking practices do not take place in their organisation. We rely on self-assessment in our supply chain but would follow up any reported concerns and may terminate the relationship if a supplier failed to comply with this policy or agree to an audit.

Our Employee Assistance Programme provides staff with a secure way of seeking advice about any modern slavery or human trafficking issues personally 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 head of HR and IMS functions to investigate and to report on action 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 increase the quantity and scope of our supplier audits.

To support this commitment, we will review and update our existing business policies including Procurement, Safeguarding and Corporate Social Responsibility, and will share these with our supply chain, as appropriate.

Approval

This document and was approved by the Board of JBA Group Limited on 20/01/2020.



Executive Chairman

JBA Group