

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 2 years but this will increase to annual if the turnover of the JBA Group reaches the legal reporting threshold specified within legislation.

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

JBA Group structure

JBA provides professional consultancy services across the world. With a core focus in the UK, Isle of Man and Ireland, JBA also has offices in 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 |

In the financial year ending 31 October 2017, we employed approximately 510 staff. 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.

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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 and which 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

Our [Whistleblowing Policy](#) protects anyone who highlights to us any risk of modern slavery or human trafficking within our business. This has been reviewed this year.

Our approved supplier process requires service suppliers to confirm that modern slavery and human trafficking practices do not take place in their organisation. This confirmation has been requested from all suppliers who have been approved since Spring 2016.

We have produced this statement and published it on all JBA websites to confirm our compliance with relevant legislation despite our turnover being below the declaration threshold.

Future improvements

We are committed to ensuring that 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.

To support this commitment, we will review and update our existing business policies including Procurement 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 09/01/2018.



Executive Chairman
JBA Group