

Policy on Anti-Bribery and Corruption



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Document purpose and scope

This document sets out the Anti-Bribery and Corruption 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 made available to interested parties. The review interval for this document is 2 years.

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 will conduct our business in an honest way. We will not be party to corruption or bribery in any form, whether to obtain an advantage, to disadvantage our customers or competitors, or for any other reason.

We are committed to adhering 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. Bribery and corruption are criminal offences in most countries where JBA does business, harms the societies in which these acts are committed and distorts economic growth and development.

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

Aim

This policy, in conjunction with our [Avoiding Anti-Competitive Behaviour Policy](#), aims to help us comply with legal requirements, maintain our high ethical standards, and protect our reputation against any allegations of bribery or corruption. Corrupt practices and acts of bribery would damage us and expose JBA, its employees and representatives to the risk of fines, imprisonment and serious reputational damage.

There are distinct commercial benefits to us acting with integrity. These include improved chances of us being selected as a supplier in both public and private sectors. The supply chain organisations of many of our customers cannot deal with us unless we have an effective policy on anti-bribery and corruption.

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 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 ensure 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. Employees are required to read and understand all aspects of this policy and the associated [Guide](#)



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to [Avoiding Bribery and Corrupt Practices](#) and abide by them. They need to be sure they know how to raise a concern and how to seek further guidance.

Line managers are required to check that their staff are aware of this policy, the associated guidance, Gift Log and Bribery and Corruption Risk Register.

Project managers are responsible for making sure our sub-contractors are aware they are required to comply with this policy whilst representing JBA or working as a sub-contractor on our projects.

Implementation

We implement this policy by following six principles:

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

We maintain a [Gift Log](#) and a [Bribery and Corruption Risk Register](#) on our intranet.

We provide all employees with a confidential reporting facility.

We communicate this policy to all Operating Companies and employees as well as our various business partners, suppliers and sub-contractors, other individuals and entities, where appropriate. Those who work in areas within our business identified as being particularly high risk will receive additional training and support in identifying and preventing corrupt activities.

The Group Board applies a “zero tolerance” approach to acts of bribery and corruption by any of our employees or by business partners/suppliers or agents working on our behalf and this is also referenced in our own supplier [Code of Conduct](#) (working with our Supply Chain). 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 15/06/2022.

Executive Chair
JBA Group

