

Policy on Equality, Diversity and Inclusion



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| Revision number | 17.0 |
| Document reference | 10-006 |

Document purpose and scope

This document sets out the Equality, Diversity and Inclusion (EDI) 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 1 year.

Aim

This policy aims to help us provide equality and fairness for all current and potential employees, subcontractors and suppliers and to avoid discrimination. We oppose all forms of discrimination and aim to create an environment in which individual differences and the contributions of all personnel are recognised and valued.

Through the application of this policy, we aim to assist our clients in complying with their duties under equality legislation relevant to the jurisdictions in which they operate.

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. Providing equal opportunities to all and valuing and celebrating our diversity is central to our inclusive culture. We recognise that each employee brings their own unique capabilities, experiences and characteristics and we value this diversity at all levels of the company in all that we do.

At JBA, we want every member of our staff to be able to contribute to the business to the best of their capacity. We believe that we can only achieve this if everyone is included, respected, valued and supported. We are committed to eliminating discrimination amongst our staff, with clients and suppliers and will look for opportunities to maximise diversity and inclusion.

We will comply with all legislation, standards, statutory and other obligations and best practices that are relevant to our activities and the jurisdictions in which we operate. We are committed to the application of equality legislation, in principle and practice, and will not discriminate on any of the grounds or protected characterisation identified in equality legislation relevant to the jurisdictions in which we work. We expect our business partners, suppliers and sub-contractors to operate in accordance with this policy.

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 Board Director with responsibility for equality, diversity and inclusion is Jeremy Benn. He will liaise with the other named Directors within the JBA Group who have accountability for equality, diversity and inclusion within their operating companies.

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, including through the provision of awareness raising and training sessions.

Our Directors and Management Teams are responsible for the provision of support and guidance to employees and line managers on equality, diversity and inclusion matters. Our Human Resources function is responsible for monitoring, evaluating and reviewing the effectiveness of this policy, and supporting Directors and Management Teams as required.

Our EDI champions will support Operating Company Directors to develop and implement annual objectives to further our equalities, diversity and inclusion work.

All staff are required to comply with our policy requirements and share responsibility for our performance in implementing it. All staff are asked to provide information on protected characteristics to inform company level monitoring of the diversity of our staff and the success of implementing this policy. Provision of this information is optional.

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

Sub-contractors and other suppliers are expected to operate in accordance with this policy whilst representing JBA or working as a sub-contractor on our projects. The policy is available from our websites.

Implementation

All personnel, whether employees, subcontractors, suppliers, part-time, full-time, permanent or temporary, will be treated fairly, with respect and without discrimination. Selection for employment, promotion, training or any other opportunities and benefits will be based on aptitude and ability.

All employees will be helped and encouraged to develop their full potential and the talents and resources of our staff will be fully utilised to maximise the potential of the JBA Group.

All breaches of our Equality, Diversity and Inclusion Policy will be regarded as misconduct that could lead to disciplinary proceedings up to and including dismissal.

We will

- provide all employees with an inclusive working environment that promotes dignity and respect to all. No form of discrimination, including but not limited to intimidation, bullying or harassment will be tolerated;
- continue to provide a confidential reporting system on our Corporate Management System for staff to use to report concerns regarding all forms of discrimination, equality, diversity and inclusion;
- make training, development and progression opportunities available to all staff;
- aim to produce documents that accord with government accessibility requirements;
- seek for all our employment practices and procedures to be fair;
- use open recruitment methods including appropriate advertising for job opportunities;
- identify where we need to and take positive action for under represented groups to further increase the diversity of our staff;
- take-up any opportunities to engage with our supply chain to encourage and learn from good practice in relation to equality, diversity and inclusion; and
- monitor and report equality information to inform progress in achieving the aims of this policy.

Approval

This document was approved by the Board of JBA Group Limited on 15/11/2024.

A handwritten signature in black ink, appearing to read 'Jeremy Ben', with a stylized flourish underneath.

Executive Chair

JBA Group