



Modern Slavery and Human Trafficking Statement

This Statement covers J.N. Bentley Ltd and joint venture companies Mott MacDonald Bentley Ltd and JBA Bentley Ltd.

J.N. Bentley Ltd is a leading UK civil engineering and construction company that directly employs over 1900 people. We have an annual turnover in the region of £425 million and are seen as a leading solution provider to the UK water industry. A significant proportion of our work is delivered through joint venture companies Mott MacDonald Bentley Ltd and JBA Bentley Ltd. The Mott MacDonald Bentley Ltd and JBA Bentley Ltd joint ventures do not directly employ their own staff but utilise employees from both parent companies to service framework-specific delivery teams.

J.N. Bentley Ltd is proud of the ethical standards it has embedded into its business over many years. We believe that these standards are entirely consistent with the underlying principles of the Modern Slavery Act 2015.

J.N. Bentley Ltd recognises the need to remain alert to the risk of slavery and human trafficking occurring in any area of its operational business and is committed to enhancing our working practices to combat all forms of slavery and human trafficking both within our own business and those of our supply chain.

- All employees, suppliers and subcontractors are encouraged to raise concerns about any suspicion that slavery or human trafficking may exist in any part of our business or supply chain. In accordance with the company's Whistleblowing Policy (November 2023), we are 100% committed to ensuring that no individual suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery or human trafficking in whatever form, is or may be, taking place in any part of our own business, or in that of any of our wider supply chain, including where this suspicion is found to be mistaken. We now subscribe to the 'Speak Up' helpline which is

a reporting tool provided and managed by an independent third-party intermediary Navex Global. Employees can 'Speak Up' 24 Hours a day 365 days per year on either the freephone number or via the web reporting tool, where they can remain anonymous if they choose to do so.

To date, we have received no reports of slavery or human trafficking relating to any of our activities.

Direct workforce

We strive to deliver as much of our output as possible through the use of our large, directly employed workforce.

- We have fair and transparent recruitment and resourcing procedures in relation to modern slavery and false employment in accordance with relevant standards and legislation.
- All employees are paid at least the national minimum wage, with payments made directly to employees without delay.
- No employees are forced to work more than the number of hours permitted by law.
- All employees are entitled to terminate their employment without penalty at any time by giving the appropriate contractual notice.

Wider supply chain

Our philosophy with regards to suppliers of all goods and services is based on the development of mutually beneficial long-term relationships. Our expectations in terms of standards and conduct are made clear to all suppliers at the very beginning of our working relationships and are reinforced through our day-to-day dealings with all tiers of the supply chain.

We will never knowingly support or deal with any business involved in slavery or human trafficking. In support of these principles, our business is committed to ensuring that:

- Appropriate training is provided to relevant employees in order to raise awareness of modern slavery and human trafficking and the potential of such matters to impact on our business.

- All staff are aware of our slavery and human trafficking statement and how to raise any concerns they may have in relation to modern slavery or human trafficking within our business and supply chain.
- All commercial agreements with external suppliers include a requirement for our suppliers to operate in accordance with the Modern Slavery Act 2015.
- Employees complete a training course via connected learning entitled 'Modern Slavery Act Awareness' that covers the essentials of the topic.

In addition, J.N. Bentley Ltd has continued to meet its supply chain commitments on slavery and human trafficking by undertaking the following steps during the 2023 financial year:

- Included Modern Slavery as a specific area of focus for all supplier assessments. In 2023, 334 number new supplier assessments were undertaken.
- Continued to ensure that all suppliers must sign to confirm that they are aware of the Modern Slavery Act 2015 and that they comply with all requirements that are set out in the Act as part of our Supplier Undertakings.
- Included Modern Slavery as an area of focus for all supplier audits: 145 no. audits were carried out in 2023.
- Developed our supply chain mapping by identifying the countries in which our suppliers' source their materials and identified the top countries most at risk of Modern Slavery to J.N. Bentley supply chain.
- To reduce the potential risk, we continue to work closely with these key suppliers and keep modern slavery discussions at the forefront, to improve awareness of the Act and understanding the steps they are taking to ensure compliance across all tiers of their supply chain.
- We have continued to improve modern slavery awareness with our site-based workforce (covering more than 700 no. employees) through Toolbox Talks and Site Manager Briefings, with posters displayed to reinforce the message. We acknowledge that it is critical that our site-based workforce is trained in how to identify the signs of

modern slavery and trafficking and feel empowered to report any suspicions.

- Our established Intranet ('Compass') houses all information and links relating the modern slavery and human trafficking to making it easy for all staff to find resources and details including reporting procedures.
- We have continued to roll-out our 'Modern Slavery Act Awareness' via Connected Learning on Compass to new starters.

Looking ahead

Our main objectives for 2024 financial year are as follows:

Direct workforce

- Continue 'Modern Slavery Act Awareness' connected learning training to relevant new starters, with refresher training provided annually for all relevant existing staff.
- Continue to review and update our 'Modern Slavery Act Awareness' training material (connected learning training and Toolbox Talks) to ensure it is current.

Wider supply chain

- Continue to engage with our suppliers on the topic of modern slavery and human trafficking, emphasising the importance of the act and understanding how they ensure compliance.
- Continue with supplier audits aiming to audit between 10-20% of suppliers identified on a risk-based approach.
- Continue to map out all tiers of our key supply chain to increase visibility and reduce any potential risk.

This statement is made in accordance with our obligation under Section 54 of the Modern Slavery Act 2015 and constitutes the J.N. Bentley Ltd Slavery and Human Trafficking Statement for the financial year 1st January 2023 to 31st December 2023. It has been approved by the board of directors and it will be reviewed and updated on an annual basis.

Signed on behalf of JNB/MMB/JBAB



Paul R Bentley, Managing Director
May 2024