



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 maintains a zero-tolerance approach to modern slavery and human trafficking, ensuring that these practices have no place in our organisation or supply chains. As a leading UK civil engineering and construction company, we directly employ over 2,500 people and achieve an annual turnover of approximately £560 million, primarily serving the UK water industry. A significant proportion of our work is delivered through joint ventures with Mott MacDonald Bentley Ltd and JBA Bentley Ltd, which develop employees from both parent companies to service framework-specific delivery teams.

Our Anti-Slavery Policy and Supplier Obligations outline the standards expected from all employees and suppliers, ensuring compliance with the Modern Slavery Act and promoting ethical labour practices. We remain vigilant to the risk of slavery and human trafficking and are committed to enhancing our practices to combat these issues within our business and supply chain.

We require all employees, suppliers, and subcontractors to report any suspicions of modern slavery or human trafficking. Our whistleblowing policy guarantees that individuals can raise concerns confidentially and without fear of retaliation. Reports can be made anonymously via our independent helpline, available 24/7.

Direct workforce

- We strive to deliver our projects primarily through our directly employed workforce.
- Our recruitment practices are fair and transparent, ensuring compliance with relevant legislation regarding modern slavery.
- All employees receive at least the national minimum wage, with payments made promptly and directly.

- Employees are not subjected to excessive working hours and are entitled to terminate their employment at any time without penalty.

Wider supply chain

Our approach to suppliers is based on building mutually beneficial long-term relationships. We clearly communicate our expectations regarding ethical standards at the onset of our relationship and reinforce these throughout our engagements. We require that all suppliers adhere to the Modern Slavery Act 2015 and demonstrate their commitment to ethical practices through regular assessments and audits.

To ensure compliance and enhanced awareness, we provide comprehensive training on modern slavery for all employees. This training is supplemented by ongoing learning resources and toolbox talks, with a focus on empowering our workforce to identify and report potential risks.

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 2024:

- Included Modern Slavery as a specific area of focus for all supplier assessments, with 226 new supplier assessments undertaken.
- Continued to ensure that all suppliers must sign to confirm their awareness of the Modern Slavery Act 2015 and compliance with its requirements as part of our Supplier Undertakings.
- Included Modern Slavery as a focus for supplier audits, with 84 audits carried out in 2024.
- Developed our supply chain mapping by identifying the countries from which our suppliers source materials, pinpointing the top countries at risk of modern slavery.
- To reduce potential risks, we continue to work closely with key suppliers, keeping modern slavery discussions at the forefront to improve awareness of the Act and compliance steps across all tiers of their supply chains.

- We have enhanced modern slavery awareness among our site-based workforce of over 800 employees through Toolbox Talks and Site Manager Briefings, supported by posters to reinforce the message. We recognise the importance of training our site-based workforce to identify signs of modern slavery and trafficking, empowering them to report suspicions.
- Our established Intranet, Compass, houses all information and links related to modern slavery and human trafficking, making it easy for all staff to access resources and reporting procedures.
- Awareness' training via Connected Learning on Compass to new starters.

Performance Metrics and Continuous Improvement

Our main objectives for the 2025 financial year are as follows:

Direct Workforce

- Continue 'Modern Slavery Act Awareness' connected learning training for relevant new starters, with refresher training provided annually for all existing staff.
- Review and update our 'Modern Slavery Act Awareness' training material to ensure it remains current and effective.

Wider Supply Chain

- Continue to engage with our suppliers on modern slavery and human trafficking, highlighting the importance of compliance and understanding how they ensure adherence to the Act. Conduct supplier audits, with suppliers identified on a risk-based approach. Continue mapping all tiers of our key supply chain to increase visibility and reduce any potential risks associated with modern slavery.

Commitment to Stakeholders

As part of our ongoing commitment to ethical business practices, we actively engage with stakeholders to solicit feedback and share best practices. Our aim is to foster a culture of openness and accountability across all levels of our organisation and supply chain

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 2024 to 31st December 2024. It has been approved by the board of directors and will be reviewed and updated on an annual basis.

Signed on behalf of JNB/MMB/JBAB



Paul R Bentley, Managing Director
April 2025