

Slavery and Human Trafficking Statement

J.N. Bentley is a leading UK civil engineering and construction company that directly employs over 1500 people. We have an annual turnover in the region of £300 million and are seen as a leading solution provider to the UK water industry. J.N. Bentley Ltd is proud of the ethical standards that 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 companies Whistleblowing Policy (July 2018), 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.

Direct Workforce

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

- All employees are paid at least the national minimum wage, with payments made directly to employees without delay.
- No employees are forced to work in excess of 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 regard 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 outset of our working relationships and are reinforced through our day to day dealing 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.

In addition, J. N. Bentley Ltd has continued meeting its supply chain commitments on slavery and human trafficking by continuing with the following steps during the 2017/18 financial year:

Slavery and Human Trafficking Statement

- Increased awareness of the Modern Slavery Act 2015 by including details in our Requirements for Suppliers and ensuring all suppliers comply with the act and commit to this by signing our Supplier Health and Safety Undertakings – Rev C.
- Continued our rollout of employee training to raise awareness of the Modern Slavery Act 2015
- Engagement with our suppliers to emphasise the importance of the act and understand how they are ensuring compliance.
- We have begun to carry out supply chain mapping exercises for areas identified as high risk and have held proactive discussions with these sections of the supply chain to understand the measures they are taking.

Looking Ahead

Our main objectives for 2018/19 financial year are the following;

- To include Modern Slavery as a specific area of focus for all supplier assessments
- To include Modern Slavery as an area of focus for all supplier audits
- To continue discussions with all parts of the supply chain to improve awareness of the act and understand the steps they are taking to ensure compliance
- To continue to raise awareness amongst employees so that they can spot the signs, with a specific focus on site-based personnel.

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 2017 to 31st December 2017. It has been approved by the board of directors and it will be reviewed and updated on an annual basis.