

# 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 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. 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 (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.

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.

- 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.

# Slavery and Human Trafficking Statement

- 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.
- All employees complete an e-Learning training course 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 2018 financial year:

- Included Modern Slavery as a specific area of focus for all supplier assessments
- Added the requirement in our supplier undertakings form 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.
- Included Modern Slavery as an area of focus for all supplier audits: 75 audits were carried out in 2018.
- Continuing discussions with all parts of the supply chain to improve awareness of the Act, understanding the steps they are taking to ensure compliance: 22 workshops were held in 2018, attended by 109 suppliers.

## Looking ahead

Our main objectives for 2019 financial year are as follows:

### Direct workforce

- Deliver a targeted campaign with our site-based workforce through the roll-out of a new Toolbox Talk and Site Manager Briefing, with posters displayed to reinforce the message. 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.
- Create an area on our Intranet ('Compass') housing all information and links relating the modern slavery and human trafficking. This will enable all staff to easily find resources and details on reporting procedures etc.
- Re-vamp the 'Modern Slavery Act Awareness' e-Learning training material to ensure it is current, before rolling it out to all staff as a refresher. Prior to this, we will continue our rollout of our existing 'Modern Slavery Act Awareness' e-Learning training to all new starters.

### 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.

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 2018 to 31st December 2018. It has been approved by the board of directors and it will be reviewed and updated on an annual basis.

Signed: 

Paul R. Bentley, Managing Director