



# 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 2,800 people and achieve an annual turnover of approximately £600 million, primarily serving the UK water, environment and energy markets. A significant proportion of our work is delivered through joint ventures with Mott MacDonald (Mott MacDonald Bentley Ltd) and Jeremy Benn Associates (JBA Bentley Ltd), which deploy employees from both parent companies to service framework-specific delivery teams.

We recognise our responsibility to ensure that modern slavery has no place in our operations or supply chain. Our supply chain includes construction subcontractors, labour agencies, plant and equipment providers, material suppliers, and specialist service partners. We remain committed to strengthening our controls, increasing transparency, and continuously improving our approach in line with evolving best practice and government guidance.

## 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. Throughout 2025, we completed 267 new supplier assessments and carried out 55 supplier audits.

## Policies

We maintain our policies that underpin our zero-tolerance approach to modern slavery. Alongside this statement, these include our Supplier Obligations, Whistleblowing Policy, Pride (Our Code) and our recruitment and right-to-work controls. Together, these policies set clear expectations for employees and suppliers and provide accessible routes for raising concerns.

Our whistleblowing channels, including a 24/7 independent helpline, allowing individuals to report concerns confidentially and without fear of retaliation. As part of our commitment to continuous improvement, we will increase the visibility of these reporting channels across our workforce in 2026 and monitor usage trends to identify where additional support or communication may be required.

## Risk Management

### 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 in line with our working time policy.

### Supply Chain

We recognise that modern slavery risks are more prevalent in labour-intensive subcontracted work, temporary or agency labour, and materials with global supply chains. To mitigate these risks, we map our supply chain to identify high-risk categories and countries, prioritise engagement with suppliers operating in higher risk areas, and conduct risk-based supplier audits. Clear escalation routes are in place to ensure concerns are addressed quickly and effectively. Policies are shared with suppliers at onboarding stage and are available on our company website.

In 2026, we will also continue mapping all tiers of our key supply chain to increase visibility and strengthen our understanding of where risks may arise. Collaboration with suppliers will remain central to our approach, helping us support improvements and close identified gaps.

To ensure we remain informed and responsive to emerging risks, we also monitor a range of external platforms, industry forums, and regulatory updates, ensuring our approach remains aligned with the latest legislation, guidance, and best practice.



## Due Diligence Processes

We apply due diligence at onboarding and throughout the growth of our supplier relationships and contract lifecycle. This includes prequalification questionnaires to assess supplier's processes and policies and signing of our Supplier Undertaking to confirm their awareness of the Modern Slavery Act 2015 and compliance. Audits are carried out on a risk-based approach and held at supplier's premises. The purpose of the audit is to not only verify the processes and policies provided at onboarding stage are maintained but an opportunity to identify areas of improvement, we can resolve together.

Modern slavery remained a specific area of focus in all supplier assessments and audits during 2025, and we strengthened our engagement through supplier workshops and direct conversations with higher risk partners.

## Training and Capacity Building

Training is key part of raising awareness across our company of modern slavery. Employees receive Modern Slavery awareness training, supported by toolbox talks and site manager briefings. In 2025, we delivered training to new starters, refreshed our intranet resources and delivered modern slavery content to over 50 suppliers through workshops.

We are updating our training in 2026 which will be more specific to the construction industry and relatable to our site-based staff. More advanced training is being developed for Procurement and Commercial teams which will focus on what they need to be aware of when making assessments on, and working with supply chains.

## Performance Indicators

The performance indicators below help us understand how effective our controls are working across both our business and supply chain.

Each year, we track the number of supplier assessments completed and the number of supplier audits undertaken, with a particular focus on higher risk categories. These checks allow us to identify issues early and work collaboratively with suppliers to address them.

We monitor supplier performance on an order basis through performance reports. In 2025, 1914 reports were completed for 606 suppliers. 2026 will see us build on our performance reporting and improve how we collaboratively manage and mitigate modern slavery risk via a 360-feedback form. We review the use of our whistleblowing channels to understand awareness and confidence in reporting.

We actively engage with clients, suppliers, employees, and wider stakeholders to share best practice and strengthen our collective response to modern slavery. We aim to foster a culture of openness, accountability, and continuous improvement across all levels of our organisation and supply chain.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes the J.N. Bentley Ltd Slavery and Human Trafficking Statement for the financial year 1 January 2025 to 31 December 2025. It has been approved by the Board of Directors and will be reviewed and updated annually.

A handwritten signature in blue ink, appearing to read "Paul Bentley".

**Paul R Bentley**

**Managing Director**