

# Slavery and Human Trafficking Statement

As a market leading UK based civil engineering and construction company 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 and 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.

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 2016 to 31st December 2016. It has been approved by the board of directors and it will be reviewed and updated on an annual basis.