

Modern Slavery and Human Trafficking (MSHT) – Modern Slavery Statement (UK)

Introduction

This statement is made pursuant to section 54(1) of the UK's Modern Slavery Act 2015 and constitutes Building Design Partnership (BDP) Limited's Modern Slavery and Human Trafficking Policy Statement for the financial year 1 July 2025 – 31 March 2026 (reflecting our corporate update to our organisational financial year dates, implemented from FY26 onwards).

Definitions

The following key terms are referenced in relation to modern slavery and human trafficking:

- **Modern Slavery:** An umbrella term for situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power (ILO, 2022).
- **Forced Labour:** All work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily (ILO Convention No. 29, 1930).
- **Human Trafficking:** The coercive recruitment or movement of people by deceptive or forceful means for the purpose of exploiting them. (Palermo Protocol, 2000).
- **Child Labour:** Work that is exploitative and hazardous or interferes with a child's education or development (UNICEF).

1. Organisational Structure and Supply Chains

BDP is a major international practice of architects, designers, engineers, and urbanists founded in 1961. Our multi-disciplinary teams produce integrated, holistic and sustainable design solutions across a wide range of sectors including education, healthcare, heritage, housing, leisure and culture, retail, science, research and technology, sport, transport, urbanism and workplace.

BDP operates from multiple locations across the United Kingdom and internationally through studios in Dublin, Rotterdam, New Delhi, Abu Dhabi, Shanghai, Singapore and Lima. In March 2016, BDP combined with Japan's leading engineering practice, Nippon Koei (now part of Tokio Marine Holdings Inc.), creating an integrated design group with genuine international reach.

The Group is structured under Tokio Marine Holdings Inc. through its wholly owned subsidiary, Integrated Design & Engineering Holdings Co. Ltd., which in turn wholly owns BDP Holdings Ltd. BDP Holdings Ltd fully owns Building Design Partnership Ltd, the principal operating company responsible for undertaking the activities of the Group either directly or through its subsidiaries and associated entities. All BDP principals have signed ID&E's Code of Conduct, which sets clear expectations for preventing modern slavery and human trafficking and ensuring compliance with associated local legislation.

This statement covers the activities of Building Design Partnership Ltd and other relevant UK operations within the BDP Group. This group-level statement is intended to meet the legal requirements for all entities within the BDP Group that are subject to the UK Modern Slavery Act,

and reflects the shared policies, procedures, and commitments to preventing modern slavery across our organisation.

2. Policies in relation to slavery and Human Trafficking

BDP is committed to ethical business practices, integrity, and the protection of human rights. We have zero tolerance for any form of modern slavery or human trafficking. This extends to all individuals working with or for BDP at all levels and grades from Principal to Trainee, and including sub-consultants, contractors, seconded staff, agency staff, agents or any other person associated with us or any of our subsidiaries or their employees as part of our supply chain.

Our Modern Slavery and Human Trafficking (MSHT) Policy and linked Guidance document set out our commitment to and approach for identifying and mitigating modern slavery risks across our business, operations (including procurement, project delivery, and services), and supply chain. This is supported by and embedded alongside several specialist people management policies across BDP, including:

- ID&E Code of Conduct
- Responsible Procurement and Ethical Trading Policy
- Anti-Bribery & Corruption Policy
- Equality, Diversity & Inclusion Policy
- Whistleblowing Policy
- Social Value Policy (UK)

Our MSHT Policy and Guidance and this Statement are reviewed annually and/or as necessary to reflect changes in law, business practices, or emerging risks. We align our work and our business with the UN Sustainable Development Goals (SDGs), including SDG 8.7, which seeks to end Modern Slavery and Human Trafficking. This policy is informed by and supports compliance with the following:

- UK Modern Slavery Act 2015
- UN Guiding Principles on Business and Human Rights
- International Labour Organisation (ILO) Conventions
- Relevant national and international human rights legislation locale to our studios and operations.

3. Due Diligence Processes

Our sub-consultants and supplier selection processes align with our Equality, Diversity & Inclusion and MSHT Policies, including our commitment to ensuring that modern slavery and human trafficking do not take place within our business or supply chain.

Due diligence around modern slavery is implemented and monitored through the following:

- Supply Chain Onboarding: Pre-qualification checklists are employed to assess both new and existing sub-consultants and suppliers for suitability and compliance. These checklists are aligned with our internal policies on people and quality and include specific questions addressing compliance with applicable modern slavery legislation, both domestic and international. This systematic approach enables early identification of risk factors within the supply chain, allowing for appropriate escalation and intervention.

- **Risk Assessment and Monitoring:** As part of our referenced project and supply chain risk profiling assessments (refer to *Section 4*), we regularly review the modern slavery and human trafficking policies, practices, and performance of our supply chain partners. This assessment incorporates desktop reviews of publicly available information, checks against third-party risk databases, and further direct engagement with members where necessary. Findings are used to evaluate and update supplier risk profiles and inform ongoing due diligence. Where elevated risks are flagged, further monitoring and targeted audits are undertaken as appropriate.
- **Recruitment:** We have a fair and transparent recruitment process where applicants are judged on their qualifications and experience and paid fair market salaries. In the UK, our recruitment processes are regularly reviewed by our EDI Network with advice from our People Team specialists and specialist legal advisors to ensure that they comply with equal opportunities legislation and best practice. To be included within our preferred supplier list, organisations involved in recruitment must provide for review copies of their people management policies (including EDI, Modern Slavery, and Social Value), or a statement around their processes (where no formal policy is in place).

Employees at BDP and in our supply chain have the right to raise concerns and should feel confident that they will be dealt with appropriately.

If our people become aware of an issue either within BDP or in our supply chain, we aim to ensure that they feel able to raise the matter internally with their Director or Head of Studio. Should this not be the case, the matter can be raised with the Group People Director, Local HR Representatives or Studio HR representatives accordingly.

Our Whistleblowing Policy also gives the option of raising the matter externally through a third-party service. Staff have access to an external whistleblowing hotline where concerns about modern slavery and human trafficking, as well as other public interest concerns, can be raised anonymously. Provided the concerns were raised in good faith, staff using whistleblowing channels will be supported, even if those concerns prove to be unfounded.

4. Risk Assessment and Management

As a design practice we are not directly involved in construction activities, but recognise the sector carries a higher risk of labour exploitation. Most of our projects are based in the UK, where robust anti-modern slavery legislation is in place, but we also operate in regions where such protections are less established. Our key supply chain members are sub-consultants, generally highly skilled professionals who we engage to provide technical and professional services on our projects, and suppliers, who we engage to support the operations of our business and studios.

As part of our corporate governance and risk management framework, we undertake periodic risk assessments to identify key risks in and to our business, including modern slavery and human trafficking.

In FY24 we confirmed that our highest-spend suppliers are primarily associated with low-risk categories, including professional services, IT, and premises costs.

In FY25 we expanded the scope and detail of our assessment process, reviewing the modern slavery and human trafficking risk profiles of our top (by spend) 350 supply chain members (including suppliers and sub-contractors) and 100 projects, using location, sector, entity type and labour profile as risk indicators. The outputs from our profiling activity are used to inform targeting of our due diligence activities and action plans for managing modern slavery risk across our business.

We review the status of risk profiles across our business and supply chain annually (or sooner as relevant to reflect changes in law, business practices, or emerging risk) helping us to ensure that our due diligence and risk management practices remain fit for purpose.

Any breaches of our MSHT Policy and associated Guidance may result in disciplinary action, which could result in dismissal for misconduct or gross misconduct.

In the event that a staff member, supplier, sub-consultant, agency or other member of our supply chain was suspected of engaging in or supporting slavery or human trafficking the relevant authorities would be advised, an investigation would be undertaken, and we would consider our relationship with them based on the results of that investigation and whether a robust action plan was put in place in response.

5. Key Performance Indicators to measure effectiveness of steps being taken

Our MSHT policy, this Statement, and associated guidance, are reviewed annually and updated as necessary to reflect changes in law, our operations, and best practice. Performance against and the impact of our policy and associated processes is monitored through:

- Training completion rates:
 - % of staff completed MS training programme within 2-month onboarding period.
- Supplier audits:
 - % of top 350 suppliers (by spend) assessed for risk of modern slavery, per annum.
- Risk assessments and reports:
 - No. of investigation required through screening of our suppliers using our supply chain management system.
- Whistleblowing reports:
 - No. of incidents reported linked to modern slavery and human trafficking.

6. Training on modern slavery and trafficking

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the organisation, BDP's mandatory onboarding programme includes an 'Anti-Slavery and Human Trafficking Policy' training module. New starters from all functions and locations are required to complete this training within the first two months of their employment, with any non-completion followed up by senior management and further escalated accordingly.

We will embed mandatory annual 'refresher' course for all BDP staff, focused on re-engaging our workforce with the principles of modern slavery, the contents of our MSHT Policy and this Guidance, spotting the signs of modern slavery, and promotion of our whistleblowing and reporting mechanisms / services (see Reporting and Whistleblowing section).

Training completion rates are tracked as part of our wider people management KPIs (see *Section 5*), with performance used to inform updates in our training resources and processes.

In the context of broader engagement and transparency, this Statement and our Policy are:

- Published on BDP's website and intranet.
- Communicated to all staff and key stakeholders as part of onboarding and mandatory training.
- Shared with suppliers during onboarding as part of our supplier management platform.
- Reinforced through regular communications and training.

7. Next Steps

In the next reporting period, we will:

- Finalise and roll-out updates to our mandatory Modern Slavery Onboarding training and Modern Slavery Refresher training, delivered through our internal LMS.
- Introduce our new supply chain management system and integrate our updated supplier and subconsultant questionnaire.
- Carry out additional due diligence activities with 'high risk' suppliers, sub-contractors, and projects identified through our risk profiling process.
- Monitor the effectiveness of our anti-modern slavery & human trafficking processes through referenced KPIs.

Responsibility for our MSHT Statement and associated Policy

For the purposes of this Statement and our MSHT Policy, the Head of Social Value will have primary responsibility for the regular review and update where appropriate. The responsibility for the appropriate and effective application of the Statement and our associated Policy and Guidance across each studio is with the Studio Chair (UK) or Studio Leader (International).

This is our Modern Slavery and Human Trafficking Statement and as Chief Executive I commit myself and the company to it.

Signed:



Nick Fairham
Chief Executive
Date: 1st October 2025