

Modern Slavery and Human Trafficking (MSHT) Policy – Supporting Guidance

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 MSHT policy and this Guidance 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, 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)
- Modern Slavery Statement (UK)

Our MSHT policy and this Guidance are reviewed annually and/or as necessary to reflect changes in law, business practices, or emerging risks.

Definitions

The following key terms are referenced in relation to our MSHT Policy, this Guidance document, and our management approach:

- 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).

Legal and Regulatory Frameworks

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. Our policy and this Guidance are 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.

Risk areas for BDP

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 this profiling activity will be used to inform targeting of our due diligence activities and action plans for managing modern slavery risk moving forwards.

We review the risk profile 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.

Due Diligence

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 *Risk Areas for BDP*), 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 (see EDI Policy). 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).

Induction and Training

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 a 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 Monitoring, Review, and Improvement section), with performance used to inform updates in our training resources and processes.

Reporting and Whistleblowing

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 representative 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.

Monitoring, Review, and Improvement

Our MSHT policy and this 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.

Communication and Publication

Our Modern Slavery Policy is:

- 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.

Breaches of this Policy

Any breaches of our MSHT Policy and this 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.

Responsibility for our MSHT Policy and this Guidance

For the purposes of this Guidance 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 Policy and Guidance across each studio is with the Studio Chair (UK) or Studio Leader (International).

This is our Supporting Guidance for our Modern Slavery and Human Trafficking Group Policy and as Chief Executive I commit myself and the company to it.

Signed:

A handwritten signature in black ink, appearing to read 'Nick Fairham', followed by a period.

Nick Fairham
Chief Executive
Date: 1st October 2025