

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 1st July 2025 – 31st March 2026. This shortened reporting window reflects a change in our financial year structure, moving from July – June periods to April – March periods. The next scheduled update is from 1st April 2027, then recurring annually.

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's 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, linked Guidance document, 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 statement 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.

In FY26 (1st April 2025 – 31st March 2026), we have further expanded the scope of this assessment to review the risk profiles of our top (by spend) 500 supply chain members (suppliers and sub-contractors) and 100 projects. This assesses (and quantifies) a supplier's risk indicators by likelihood (based on geographic location, sector, entity profile, and labour profile) and impact (based on severity of harm, scale of workers affected, vulnerability of workers) with any scoring 'high risk' then flagged. The outputs from this profiling activity will be used to inform targeted review and further due diligence activities (as relevant) for managing modern slavery risks over the next period.

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. The next scheduled date for this is from 1st April 2027.

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 are monitored through screening of our suppliers using our supplier management system. Core assessment areas and KPIs include:

KPI	Baseline / Benchmark	FY Performance	Reporting Date
Training Completion Rates			
% of staff completed MS training programme within 2-month onboarding period	97.7%	100%	May 2026
% of staff completed mandatory 'MS Refresher Course' training	-	100%	May 2026
Supply Chain Audit			
% of top 350 suppliers (by spend) assessed for risk of modern slavery, per annum	100%	100%	May 2026
Risk Assessments and Reports			

No. of investigation required through screening of our suppliers using our supply chain management system	-	4	May 2026
Whistleblowing Reports			
No. of incidents reported linked to modern slavery and human trafficking	-	0	April 2026

Under our current reporting structure, performance against these KPIs is monitored bi-annually between the Head of Social Value, Global Director of Sustainability, and Chief Operating Officer.

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 updated 'Modern Slavery Refresher' 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. This training focuses on 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). This training was refreshed during FY26 and re-issued to all members of BDP's workforce (March 2026). This aligns with our commitment to ensuring that everyone who works within and for BDP is awareness and empowered in addressing risks associated with modern slavery.

From the start of FY27, we will be implementing an annual 'check-in' training in support of the core training module. This will help reinforce key principles, provide updates on emerging risks and best practices, and ensure that awareness of modern slavery issues remains current, relevant, and embedded across our workforce.

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 (1st April 2026 – 31st March 2027), we plan to:

- **Supplier Management:** Continue the introduction and roll-out of our new supply chain management system and integration of our updated supplier and subconsultant questionnaire.
- **Specifications:** We are developing a standard clause to be added to the BDP Standard Specifications to better support BDP and our clients in raising issues associated with modern slavery and human trafficking, where identified, in our projects. This will set out that contractors, subcontractors, suppliers, and manufacturers shall be required, under the terms of their respective appointments, to implement appropriate policies and due diligence procedures around modern slavery, and to provide, upon request, reasonable evidence of compliance, with references to the relevant standards we expect them to use when compiling this information. Plans are for this specification to be available for by the end of the current financial year (31st March 2027).
- **Due Diligence:** Carry out annual due diligence activities with 'high risk' suppliers, sub-contractors, and projects identified through our risk profiling process.
- **Training:** Develop and implement annual 'check-in' modern slavery training module, to sit alongside core training module.
- **Monitoring and Reporting:** Monitor the effectiveness of our anti-modern slavery & human trafficking processes through referenced KPIs, as part of internal monitoring and external reporting exercises.

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). Across service lines and projects, responsibility for implementation rests with our Profession Leads, Sector Leads, Principal Group, and Project Directors.

The next scheduled review data for this statement is from 1st April 2027, covering the FY27 reporting period of 1st April 2026 – 31st March 2027.

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



Nick Fairham
Chief Executive
Date: 28 September 2026