

Modern Slavery and Human Trafficking (MSHT) Policy – Supporting Guidance for MS-POL001 V002

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. The next scheduled review date is from 1st April 2027.

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.

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.

Supply chain risk profiles are reviewed 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.

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.
- **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 reporting period (April 2026 – April 2027).
- **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 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 Monitoring section), with performance used to inform updates in our training resources and processes. At this time of this update, completion rates are at 99%, with on-going work to bring this to 100%.

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.

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.

This is reported externally through our public-facing annual ESG report, available on BDP's website.

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 next scheduled review date for this Guidance document is from 1st April 2027.

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

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.



Nick Fairham
Chief Executive
Date: 28 September 2026