

# **BDP Global Modern Slavery and Human Trafficking Policy**

## **Our Anti-Slavery and Human Trafficking Policy**

Slavery is defined as ownership exercised over a person, forced labour is where individuals are coerced into providing their services or do so under threat of a penalty. Human trafficking is defined as arranging or facilitating the travel of individuals with a view to exploiting them and for which the said person has not offered herself or himself voluntarily. Child labour is work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

BDP adopts a zero-tolerance stance to modern slavery, child labour and human trafficking and is committed to acting ethically and with integrity in all our business dealings and to taking steps to ensure they are not taking place in our business or supply chains. There shall be no forced, bonded, or involuntary labour. 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 Commitment**

Our commitment to preventing modern slavery, child labour and human trafficking extends to all individuals working with or for BDP at all levels and grades, including directors, senior managers, staff, 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.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the organisation, BDP's mandatory training programme includes an 'Anti-Slavery and Human Trafficking Policy' module. All new starters from all functions and locations are required to complete the training within the first two months of their employment and all existing staff are required to complete a refresher training every year via an online training portal and any non-completion is followed up by senior management.

## Reporting

If our staff 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 HR Director or Studio HR representatives.

Our Whistleblowing Policy also gives the option of raising the matter externally and staff also 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.

#### **Breaches of the Policy**

Any breaches of this policy may result in disciplinary action, which could result in dismissal for misconduct or gross misconduct.

In the event that a staff member, contractor, sub-consultant, agency or other member of our supply chain was suspected of engaging in or supporting slavery or human trafficking, 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.

Action in this area would be driven by our Chief Executive, who is fully supported by the BDP Board of Directors and the Executive Management Group.

#### **Responsibility for the Policy**

For the purposes of this policy, the Group Finance Director will have primary responsibility for the regular review and update where appropriate. The responsibility for the appropriate and effective application of the policy across each studio is with each Studio Chair (UK) or Studio Leader (International).

This is BDP's Modern Slavery and Human Trafficking Group Policy and as Chief Executive I commit myself and the company to it.

Nick Fairham Chief Executive 29 August 2024