

## Modern Slavery and Human Trafficking Statement

**This Statement sets out the actions we have taken to prevent slavery and human trafficking in our business and supply chains during the financial year 2024-2025. This Statement is an update to the Statement published in December 2024 and fulfils the legal obligations of BMT Group Limited and BMT Limited, under section 54 of the Modern Slavery Act 2015 (the “Act”), and in accordance with the modern slavery laws of other locations in which BMT operates (hereby referred to collectively as “BMT”). BMT fully supports the aims of the Act and associated standards. Our colleagues, suppliers, customers, business partners and others we work with all have a responsibility to tackle slavery and human trafficking wherever they can in the course of business.**

BMT is an international design, engineering, and risk management consultancy, working principally in the maritime sector. BMT was established in 1985 by bringing together research and technology organisations that traced their roots back to the beginning of the 20th century. Our customers are served by around 1,300 professionals located in an international network. Our head office is based in London, UK. BMT works across a wide range of sectors, but is primarily a service-based business. Although BMT does not have a complex supply chain, we acknowledge the importance of monitoring and ensuring responsible business conduct, to try to prevent modern slavery from occurring.

This Statement explains the policies and activities we have in place to mitigate the risk of all forms of modern slavery in our business and supply chain. It also provides an update on the activities we have conducted during this year, to improve our approach to mitigating modern slavery, which includes implementing:

- An automated system to collect and manage supplier information in one place.
- A two-part training initiative for senior leaders, completing e-learning and leading team discussions, to embed modern slavery awareness throughout the organisation.
- Seasonal internal communications to raise employee awareness of modern slavery and encourage responsible consumer choices.

We have continued to screen new suppliers through an onboarding questionnaire, a process established across the UK, for all new suppliers. We continue to monitor regulations and guidance relating to the prevention of modern slavery and human trafficking in the regions where we operate, to ensure that our policies and processes are up to date and remain compliant.

## Governance

We recognise that good governance is essential for driving improvements and preventing modern slavery. Oversight of ethics, compliance, and modern slavery matters has been integrated into BMT's core governance and operational processes. Responsibility for the Modern Slavery Statement now sits within the Sustainability function. This ensures continued alignment between our ethical governance and sustainability commitments.

Ethical decisions on specific projects and bids are reviewed during gate reviews, while broader ethical matters are elevated for consideration by the Executive Committee and the Board. This governance approach supports the continued implementation of BMT's Modern Slavery Statement and ensures that ethical considerations, including human rights and supply chain integrity, remain embedded in business decision-making.

All employees are required to complete the Employee Code of Conduct training every two years. This training is embedded into the onboarding programme for all new joiners. The training has recently been updated, and the revised version is now in use for all new starters. It includes a chapter on modern slavery, aimed at raising awareness and educating employees about the procedures BMT has in place to mitigate the risks of modern slavery across its operations. BMT's internal audit function checks for awareness, application, and compliance with the Employee Code of Conduct on an ongoing basis.

Governance on human rights issues is also supported through our global business risk register and Statement of Ethics. Our Statement of Ethics presumes we will not work in sanctioned countries and those considered human rights priorities by the UK FCDO. Where there is an overriding reason to do so, a separate assessment of ethical risks, including human rights, is required prior to bidding.

## Our Policies

The following instruments help to mitigate the risk of modern slavery taking place in our operations and supply chains:

- **Supplier Code of Conduct** is used by BMT within the UK when onboarding new suppliers. It enables BMT to set the expectations of our suppliers to meet regulatory requirements and uphold our company values. This Code is a gateway for BMT procurement. If a supplier cannot meet the requirements and expectations set out in our Code, they may be operating unethically and could be a higher-risk supplier to

engage with. We plan to roll out similar requirements within our North America and APAC regions in due course.

- **Diversity Equity and Inclusion Policy** explains how we encourage a culture and operational environment of Diversity, Equity, and Inclusion, in a way that maximises opportunities for everyone. It sets a standard of expectations and behaviours.
- **Valuing Others Policy** outlines how BMT expects everyone to display and promote the BMT Behavioural Competencies, both with each other and with third parties. The Policy also describes how we manage non-compliance.
- **Raising Concerns Policy** supports the disclosure by individuals of wrongdoing occurring across BMT's value chain so that appropriate action can be taken. It operates in conjunction with and does not take away the protection that exists under the law.
- **Health, Safety and Environment Management Policy** supports BMT's mandatory requirement to comply with national and international occupational health and safety related Regulations and Acts that apply to BMT in the jurisdictions where we operate.

## Training and Communication

To make employees aware of the Act, we share this Statement with all employees through our internal communications channels, and a copy of it is made available on BMT's website.

We launched a mandatory modern slavery training module for leaders to strengthen understanding of our statutory and moral responsibilities in addressing modern slavery. The programme combined e-learning with a practical "modern slavery moment," requiring leaders to deliver a short discussion using a provided presentation during team meetings. This approach ensured that awareness, accountability, and conversation about modern slavery cascaded throughout the organisation. The initiative reinforces our commitment to going beyond compliance by embedding ethical awareness and responsibility across all levels of the business.

During the festive season, we also published an internal article titled "*What's Beneath the Gift-Wrap?*" from our Sustainability Director to raise awareness of modern slavery risks within global supply chains. The communication encouraged employees to consider the human

impact behind everyday purchasing decisions and to make ethical, informed choices when buying goods and services. This initiative supported our approach to modern slavery by fostering awareness, personal accountability, and open discussion across the business, reinforcing the role our people can play in driving ethical practices and influencing positive change through our collective actions and procurement choices.

## Supply Chain Management

We aim to lead by example, drive best practices through our purchasing behaviours and develop commercial partnerships across the industry. Our largest suppliers are professional service providers, including those offering software, insurance, consultancy and commercial property services. Other suppliers include those who deliver services in our offices such as cleaning, maintenance, and catering. We also buy products including promotional merchandise, ICT equipment and stationery.

Our Supplier Code of Conduct is founded on the principles of sustainability and our ethos as a business. This Code helps to ensure we can uphold the highest levels of integrity and ethical standards where we operate, whilst driving social, economic, and environmental improvements in our extended supply chain. It is scheduled to be reviewed and updated in the next financial year to ensure it reflects any changes in our practices, commitments, and regulatory requirements.

The Code sets out the duties of all our suppliers to:

- Adhere to our Code, explaining the standards for doing business with us.
- Comply with all applicable laws including the Act and relevant contractual terms.
- Seek continuous improvement in alignment with the UN Global Compact Ten Principles.
- Provide full and timely cooperation with reasonable requests for information, to determine the supplier's compliance with the Code.

We require new suppliers to sign up to our Code (or have materially similar codes of their own), to verify that their working practices align with our values. They are required to communicate the Code principles down the supply chain to their subcontractors and other business partners involved in supplying products and services to BMT.

BMT is committed to ensuring that our supply chains operate in line with modern slavery legislation and reflect our ethical values. BMT's Enterprise Resource Planning (ERP) system

ensures that no suppliers can be onboarded without completing a supplier questionnaire, which includes confirming compliance with modern slavery laws.

We are also working to engage with our suppliers, encouraging them to adopt our ethical principles by signing up to our Supplier Code of Conduct and Anti-Bribery Policy. Our ERP system provides us with better visibility into our supply chain, allowing us to assess and address any risks more effectively. We are making continuous improvements to how we communicate and work with our suppliers, and our ERP system is part of our broader commitment to creating responsible, transparent, and ethical business practices across our supply chain.

This year, we've improved how we manage compliance across our supply chain. Enhanced supplier workflows help us stay focused on ethical standards by centralising information. This has enabled us to:

- Capture supplier agreement to BMT's Code of Conduct and Anti-Bribery policies, which include commitments to ethical labour practices.
- Maintain verified supplier details (company registration, VAT, bank details) to reduce risk of fraudulent or exploitative entities.
- Track insurance and accreditation status, ensuring suppliers meet industry standards.

Our aim for this year is to further develop the process for updating insurance and accreditation records by introducing automatic reminders for suppliers to provide the necessary documentation ahead of expiry. This strengthens BMT's control of its supply chain by proactively ensuring suppliers remain compliant with relevant insurances and certifications by reducing manual follow up and demonstrates our commitment to supply chain compliance.

By utilising digital tools effectively, we are continuously evolving our approach to preventing modern slavery. This includes delivering greater value and consistency through effective supplier management, enhanced reporting, and improved visibility. All of which help build a resilient and ethically sound supply chain.

## Raising Concerns

Our employees and other stakeholders may raise a concern about possible improper, unethical, or illegal practices online, by phone, via a web portal, or by downloading an app through our external provider. We are committed to dealing with such notifications openly and responsibly. Those who raise genuine concerns in good faith will not be at risk of disciplinary

action and will be protected from adverse consequences. During FY24/25, we have had no issues raised about modern slavery via these routes.

## Our Commitment

BMT fully supports the aims of the Act and associated standards. We are committed to maintaining and improving systems and processes to help ensure that there are no human rights violations related to our operations or our supply chains. We proactively work in partnership with our customers, suppliers, and partners to identify and implement preventative checks and measures, to assure ourselves that our activities are fully accountable, compliant, and transparent. We will continue to update policies and procedures as required to ensure we maintain appropriate safeguards against any mistreatment of individuals involved in our supply chain and our businesses.

## Approval

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes BMT's Modern Slavery and Human Trafficking Statement for the financial year ending 30 September 2025 and has been approved by the Board of BMT Group Ltd for and on behalf of its subsidiaries.



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Gareth Taylor  
Chief Financial Officer (CFO)  
**Director, BMT Group Limited**  
**4<sup>th</sup> December 2025**