

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 2023-2024. This Statement is an update to the Statement published in December 2023 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 1,400 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 the introduction of:

- Supplier on-boarding, as part of a new Enterprise Resource Planning (ERP) rollout.
- An employee “Share and Connect” awareness session on Modern Slavery and Human Trafficking.
- Modern Slavery and Human Trafficking training modules.

We have continued to screen new suppliers through an onboarding questionnaire, a process now 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 achieving our objective to eradicate modern slavery. Guidance is provided by our Ethics and Compliance Committee (ECC) which continues to provide leadership and engagement across our key ethics and compliance risks.

The ECC comprises employees who represent our global business services and relevant business functions. The role of the ECC is to support compliance with legislation, deliver good governance, and drive ethical business behaviours. The ECC reviews and updates the 'Employee Code of Conduct' which sets out the standards of conduct that all employees (including contractors) are expected to meet across the business. Employees are required to undertake Employee Code of Conduct training every two years. This is embedded as part of our onboarding programme for all new joiners. Modern Slavery is included as a chapter, to educate employees and make them aware of the procedures BMT has in place to mitigate the risks of modern slavery across daily operations.

We have a confidential raising concerns hotline to ensure that employees can anonymously submit concerns. 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 provided using 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 support us in mitigating the risk of modern slavery taking place in our operation 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 follow 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 are looking 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.

In December 2023, as part of our ongoing commitment to educating employees about modern slavery, BMT hosted a dedicated session led by our sustainability team. This session highlighted the human impact of individual and business purchasing decisions and supply chain practices, especially during peak consumer demand periods, such as the holiday season. The session emphasised the importance of mitigating modern slavery risks through ethical sourcing and responsible business conduct. The session fostered a deeper understanding of how individual and collective choices can contribute to global solutions against modern slavery.

Our learning and development service within our performance portal has been updated to provide e-learning modules for employees, which can be tailored to their goals, and objectives. The modules include training on Modern Slavery and Human Trafficking.

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 services providing software, insurance, consultancy, commercial property services, etc. 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.

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 supplier 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. We have implemented an Enterprise Resource Planning (ERP) system in the UK, with a long-term plan to extend this to other regions. This 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 new ERP system is part of our broader commitment to creating responsible, transparent, and ethical business practices across our supply chain.

Assessing the Risks

BMT seeks to identify any potential exposure in our supply chain to modern slavery and human trafficking, by using the Global Slavery Index.

To understand which of our supply chains should be screened for modern slavery as a priority, we use a risk assessment for BMT Group Limited and BMT Limited supply chains.

For the risk assessment the 'Global Slavery Index' was referenced (the '**Index**'). This Index provides a country-by-country ranking based on the number of modern slavery cases, and the corresponding actions governments are taking to respond. The Index was also used to identify products and services in our supply chain that are most likely to have been exposed to modern slavery.

None of the suppliers examined were from high-risk countries and only one supplier was identified as providing us with high-risk goods (high-risk goods are products in the global supply chains that are at risk of being produced by modern slavery). Since the assessment, we continue to review and monitor these suppliers by reviewing their annual Modern Slavery Statement to ensure they are doing all that they can to mitigate the risk of slavery and forced labour in their supply chain.

Raising Concerns

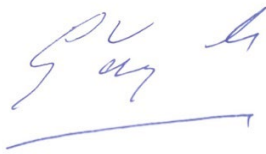
Our employees and other stakeholders may raise a concern about possible improper, unethical, or illegal practices online, by phone, via a web portal, or by downloading an app through our external provider. We are committed to dealing with such notifications openly and responsibly. Those who raise genuine concerns in good faith will not be at risk of disciplinary action and protected from adverse consequences. During FY23/24, 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 2024 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
12th December 2024