

Modern Slavery & 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 2022-2023. This Statement is an update to the Statement published in December 2022 and fulfils the legal obligations of BMT Group Limited and BMT Limited, under section 54 of the Modern Slavery Act 2015 (the “Act”), and per the modern slavery laws of other locations in which BMT operates. BMT (comprising BMT Group Limited and its subsidiaries) 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 their business.

We are 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.

In recognition of the widespread work that BMT conducts and our interactions with a wide range of industries, we acknowledge the importance of closely monitoring our supply chains and ensuring responsible business conduct, to try and 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 updates you on the activities we have conducted during this year, to improve our approach to mitigating modern slavery, which includes the introduction of:

- A statement of ethics.
- A Modern Slavery chapter into our Employee Code of Conduct training.
- Modern Slavery on our global business risk register.

We have also continued to screen new suppliers through an onboarding questionnaire, and monitored regulations or 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

At BMT, 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, including modern slavery.

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. This year a Modern Slavery chapter was embedded, educating employees about modern slavery, and 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 regarding alleged Code violations or other matters. 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 and Supplier Code of Conduct

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 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.

- **Diversity and Inclusion Policy** explains how we encourage a cultural 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 & 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 2021 all BMT employees attended online training regarding the Supplier Code of Conduct and the onboarding of all new suppliers, ensuring that all employees understood that all suppliers would need to uphold the same ethical principles as us.

Supply Chains

We aim to lead by example, drive best practices through our purchasing behaviours and develop commercial partnerships across the industry. Our largest suppliers are predominantly 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.
- Be aware of and seek to deliver continuous improvement in line 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 (and existing suppliers entering into new contracts) 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.

Our supply chain is further assessed via our supplier onboarding questionnaire which helps us to verify that our supply chain has the necessary skills, qualifications, and working practices to trade with us. Manual due diligence checks including financial and background searches are also conducted on larger suppliers to avoid trading with businesses that participate in unethical practices.

Launching October 2023, we are implementing an Enterprise Resource Planning (ERP) system that will require purchase requisitions for acquiring new goods or services. This consistent way of working will provide us with greater visibility over our approach to procurement and will enable us to be better equipped to assess, address, and mitigate the risks associated with modern slavery.

Assessing the Risks

With 821 suppliers in the UK alone, we seek 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. The risk assessment was undertaken on our top 15 suppliers by spend in 2021/22.

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 15 suppliers 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 have continued 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. Since conducting the initial assessment, there have been no alterations in our top 15 suppliers.

Raising Concerns

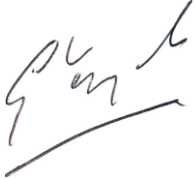
Our employees and other stakeholders may raise a concern about possible improper, unethical, or illegal practices online, by phone, via a web portal, or by downloading an app through our external provider. We are committed to dealing with such notifications openly and responsibly. Those who raise genuine concerns in good faith will not be at risk of disciplinary action and protected from adverse consequences. During FY22/23, 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 & Human Trafficking Statement for the financial year ending 30 September 2023 and has been approved by the board of BMT Group for and on behalf of its subsidiaries.



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Gareth Taylor
Chief Financial Officer (CFO)
Director, BMT Group Limited
19 December 2023