

## **Modern Slavery and Human Trafficking UK Policy Statement**

### **Introduction**

This statement is made pursuant to section 54(1) of the UK's Modern Slavery Act 2015 and constitutes Building Design Partnership (BDP) Limited's Modern Slavery and Human Trafficking Policy Statement for the financial year 1 July 2023 – 30 June 2024.

### **Organisational Structure**

BDP is a major international practice of architects, designers, engineers, and urbanists founded in 1961. Our multi-disciplinary teams produce integrated, holistic and sustainable design solutions across a wide range of sectors including education, healthcare, heritage, housing, leisure and culture, retail, science, research and technology, sport, transport, urbanism and workplace.

BDP works from several locations in the UK and from Studios in Dublin, Rotterdam, Abu Dhabi, Shanghai, New Delhi, Singapore, Toronto, Lima and New York. In March 2016, BDP combined forces with Japan's leading engineering practice Nippon Koei to form an integrated design group of genuine international reach.

A group structure is in place with BDP Ltd. being the operational company that undertakes all the operations of the group, either directly or through its subsidiaries and associates.

BDP Holdings is not required to produce a modern slavery and human trafficking statement as it is a holding company only and does not supply goods or services. Integrated Design & Engineering Holdings Co., Ltd. (ID&E Holdings Co., Ltd.) was established above BDP Holdings to enable our parent company Nippon Koei to take steps in achieving its growth strategy. ID&E Holdings Co., Ltd. is not required to produce a modern slavery and human trafficking statement as it is a holding company only and does not supply goods or services.

### **Our Modern Slavery and Human Trafficking UK Policy Statement**

Modern slavery, in accordance with Guidance issued by the UK Home Office, is a term that encapsulates slavery, servitude and forced or compulsory labour, and human trafficking.

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.

Modern slavery, including child labour and human trafficking are acknowledged to be a global problem. BDP is committed to taking steps to ensure that modern slavery, child labour and human trafficking are not taking place in our business and supply chain. 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 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.

We act ethically and with integrity in all our business relationships and strive to implement effective systems and controls to ensure that their high standards are maintained and shared. We encourage any individual who has concerns about unethical behaviour in any part of our practice or operation to raise their concern.

## **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 Director of HR 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.

BDP has a number of policies which aim to minimise the risk of modern slavery in our supply chain:

- Responsible Procurement Policy
- Anti-Bribery & Corruption Policy
- Equality, Diversity & Inclusion Policy
- Social Value Policy (UK)
- Whistleblowing Policy

We have a fair and transparent recruitment process where applicants are judged on their qualifications and experience and aim to pay fair market salaries. We participate in a number of surveys, including the RIBA annual benchmarking survey an element of which reviews average salaries across the architecture profession. BDP is a Living Wage Employer, accredited by the UK Living Wage Foundation. In September 2022 BDP gained Supporter status with the Greater Manchester Good Employment Charter and in March 2023 we have been accredited by the Good Work Standard in London.

## **Risk Assessment**

As part of our wider governance and risk management framework, we undertake periodic risk assessments to identify the key risks in our business.

Whilst we recognise that the construction sector is regarded as high risk in terms of labour exploitation, as a design practice, we are not directly involved in construction activities. However, should our staff witness any exploitative practices whilst visiting construction sites, these can be escalated using the methods outlined in the previous section.

Although the majority of our projects are situated in the UK which has strong anti-modern slavery legislation, we do have projects in countries where this may not be the case. We will conduct further work to identify any risks associated with projects in countries with less established anti-slavery provisions.

Our key suppliers are sub-consultants (ranging from individuals to large international practices) who we engage to provide technical and professional services on our projects. They play a vital role in supporting our projects and our reputation depends on the quality of services they deliver. We seek to ensure that we only work with sub-consultants who share our both commitment to quality and our ethics and values. As they are generally highly skilled professionals, we regard them as being at low risk of exploitation.

We have started to review our supply chain (non sub-consultants) and have been able to confirm that BDP's largest suppliers (in terms of spend) are predominantly related to professional services, IT costs and premises costs such as rent and business rates. The risk of modern slavery and human trafficking in these types of suppliers is considered to be low.

## **Due Diligence**

Our procedures for selecting sub-consultants, service providers and suppliers align with our commitment to equality, diversity & inclusion and human rights, including our commitment to ensuring that modern slavery and human trafficking does not take place within our business or supply chain.

We use pre-qualification checklists when selecting potential sub-consultants and suppliers and when reviewing our existing supply chain partners. The checklists align with our own values and standards, for example our sub-consultants' pre-qualification checklist covers all aspects of policy and business activities, including specific questions relating to the Modern Slavery Act 2015.

In the event that a contractor, sub-consultant, agency or other member of our supply chain was suspected of engaging in or supporting slavery or human trafficking, the authorities would be advised, an investigation by BDP 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.

### **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 month of their employment and all existing staff are required to complete a refresher training every two years via an online training portal and any non-completion is followed up by senior management.

### **Next Steps**

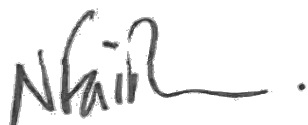
In the next reporting period, we will:

- Set out plans to monitor & report ESG information
- Update our supplier questionnaire & integrate an ESG Strategy
- We will monitor our Supply Chain in High-Risk Regions more thoroughly and will create an approved supplier list in these regions where we have Studios
- Measure the effectiveness of our anti modern slavery & human trafficking processes

### **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 the Studio Chair (UK).

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



Nick Fairham

**Chief Executive**

06 December 2023