



Modern Slavery Transparency Statement

2023/2024

SCOPE

This statement explains the steps that Briggs & Forrester took in 2023/2024 (from 1st November 2023 to 31st October 2024) to identify, prevent and mitigate modern slavery in our operations and supply chains. It describes the steps we have taken to assess where the risks are highest, where we have greatest influence and leverage, and where we want to prioritise our action. The statement includes details on how we will identify modern slavery risks, the mitigation and due diligence processes implemented and how we can ensure remediation where any exploitation has been uncovered.

This statement covers Briggs & Forrester (UK) Limited on its own behalf and on the behalf of all its subsidiary companies within the Briggs & Forrester Group Ltd ('the Group').

Subsidiary companies of Briggs & Forrester (UK) Limited subject to the reporting requirements under s.54 of the UK's Modern Slavery Act 2015 are: Briggs & Forrester Ltd, Briggs & Forrester Group Ltd, Briggs & Forrester (Holdings) Ltd, Briggs & Forrester Engineering Services Ltd, Briggs & Forrester Living Ltd, Briggs & Forrester Special Projects Ltd and Briggs & Forrester Building Services Maintenance Ltd.

CONTEXT

The Group specialises in the design, installation, project management, testing and commissioning of building engineering services (MEP) and maintenance services within the UK construction sector.

The Group consists of three building services engineering installation and project management companies and one facilities maintenance company.

All our companies operate within the UK, with our Head Office in Northamptonshire and seven satellite offices in London, Birmingham, Warrington, South Normanton, Bristol, Leeds and Cardiff.

The Group has an annual turnover of more than £260 million, with around 900 directly employed staff. The Group employs numerous indirect and temporary staff, including agency labour, on our construction projects.

Construction workers in the UK are known to be vulnerable to exploitation due to a range of structural challenges in the industry, such as a reliance on temporary low skilled migrant labour, fragmented supply chains and low-cost tendering. Foreign migrant workers in our UK construction projects may be more vulnerable to debt bondage through exploitative recruitment fees or fraudulent online recruitment. Research indicates almost one fifth of global modern slavery victims in the private sector are exploited in construction.

In the reporting period we spent £147.6 million within our supply chain. Our supply chain consists of over 400 companies including suppliers of construction and MEP materials, labour, agency staff and specialist subcontractors used to build, install and maintain our client's buildings.

All our key supply chain spend is with UK registered companies, although many of our suppliers have complex global supply chains with multiple tiers below. We often have limited visibility of either the labour and raw materials supply chains for our construction projects, due to multiple levels of subcontracting or where many of the products are made or raw materials sourced from for product manufacture.

Some raw materials and components can be from countries / regions or areas with a high risk of modern slavery and forced labour (as identified in the Global Slavery Index). We recognise that it is often workers in the lowest tiers of supply chains that are the most vulnerable.

We are aware of risks in the sourcing and processing of key products within our sector, such as photovoltaics and construction labour.



POLICIES

The Group is committed to driving out acts of modern slavery and human trafficking within its business and supply chains, including its sub-contractors and partners.

In July 2024, the Group conducted a thorough review of its Modern Slavery and Human Trafficking Policy and republished this in August 2024.

The Modern Slavery and Human Trafficking policy is supported by other policies including our Whistleblowing SeeHearSpeakUp Policy, Sustainability Policy and Code of Conduct Disciplinary Procedure.

The Group revised its Whistleblowing SeeHearSpeakUp Policy in August 2024.

The Group Code of Conduct & Disciplinary Procedure supports this Policy by setting out clear standards of conduct from our employees.

RECRUITMENT & RIGHT TO WORK CHECKS

Our central Payroll Team comply fully with the relevant employment laws and right to work checks on any new employees.

SUPPLY CHAIN ASSESSMENTS / CHECKS

The Group utilised SafeContractor to evaluate our supply chain. During the period, completed SafeContractor Assessments show that 100% of those required have produced Modern Slavery Statements, which was 73% of those assessed. Many of our supply chain SMEs have taken steps to produce Modern Slavery Statements, however some have not as they fall below the legal threshold.

In addition to SafeContractor assessments, we conduct supply chain vetting using our Supply Chain PQQ process. During 23/24, 225 PQQs were completed by our supply chain partners. The PQQ responses received show that 92% have a Modern Slavery Policy. The remaining 8% are SMEs that fall below the threshold requirement. None of the supply chain vetted in our Supply Chain PQQs declared that they had been subject to any prosecutions under the Modern Slavery Act.

Any organisations who have been convicted of a modern slavery offence under the Modern Slavery Act will be excluded from our supply chain, unless they can demonstrate that they have (with our support) taken measures to remedy the failure and prevent recurrence. *(Further details are given within our Modern Slavery & Human Trafficking Policy).*

ORGANISATIONAL GOVERNANCE STRUCTURE

During the period, accountability and responsibilities for delivering against the Group's commitments were assigned by the Group Board to a Modern Slavery Governance Team.

The Governance Team consists of an ascribed Modern Slavery Champion and the Group Sustainability & Quality Manager, who will be supported by relevant leads in each of the Group's businesses. These leads will include representatives from commercial / procurement (for our supply chain) and recruitment and payroll functions (for our own business).

Responsibilities have been agreed for modern slavery between the Group Board and the Group's Modern Slavery Governance Team. *(Full details are given in our Modern Slavery & Human Trafficking Policy).*



SUPPLY CHAIN MAPPING & RISK ASSESSMENT

During the period, the Group have established and completed a supply chain heat mapping process to identify the procurement processes / disciplines with the highest risks of modern slavery within the scope of our operations.

A process for Modern Slavery Risk Assessments was created during 2023/2024 for conducting risk assessments on the supply chain categories identified in the above process.

(Refer to our Modern Slavery and Human Trafficking Policy for full details).

REPORTING

We continue to support our Whistleblowing Policy by utilising the SeeHearSpeakUp service, which allows anyone working for and on behalf of our organisation to anonymously report any known or suspected wrongdoing (including modern slavery).

Our Modern Slavery & Human Trafficking Policy communicates the above mechanisms, in addition to providing details for contacting the GLAA or the police.

Whilst during this period there have been no known, suspected or reported occurrences of modern slavery within our business and supply chain, we acknowledge that there may still be undiscovered instances within our business and supply chain. Therefore, we are looking to continually enhance our due diligence and reporting processes, and to increase awareness of modern slavery among our employees and supply chain. *(Refer to Areas for Improvement and Future Goals within this statement).*

TRAINING & AWARENESS

In 2023/24, we allocated a mandatory modern slavery awareness training module to all direct employees through our eLearning platform. During the period a further 139 employees completed awareness training, which has totalled more than 35 hours of learning.

We recognise that as we subcontract much of our work that we need to develop our supply chains understanding and awareness of modern slavery. Therefore, in partnership with the Supply Chain Sustainability School we have developed the B&F Modern Slavery Learning Pathway. This Learning Pathway includes the Supply Chain Sustainability School modules:

- Modern Slavery – Sustainability Short
- The Modern Slavery Act
- Spotting the signs of Modern Slavery in business
- Responding to the Modern Slavery Act 2015
- Supply Chain Mapping and Modern Slavery

In January 2024, we became a Partner of the Supply Chain Sustainability School (SCSS) and as a SCSS Partner have joined the SCSS Modern Slavery Leadership Group. During March 2024, we began onboarding our key supply chain partners to the SCSS. Towards the end of the reporting period, we began the allocation of our Modern Slavery Learning Pathway to our supply chain, of which 16 of our key supply chain partners had completed by the end of October 2024.

To ensure awareness is also raised amongst our direct and indirect site operatives, our TBT93 Modern Slavery Toolbox Talk is delivered across our construction projects.

REMEDIATION

During the period, the Group have outlined a process for remediation where any instances of modern slavery are identified. *(Refer to our Modern Slavery and Human Trafficking Policy for full details).*



PARTNERING TO SUPPORT THOSE AFFECTED BY MODERN SLAVERY

During 2023/24 we have:

- Joined the Supply Chain Sustainability School's Build Environment Against Slavery Group.
- Participated in Ride4Freedom's charity event to raise funds and awareness of modern slavery by organising charity bike rides and sponsorship.

PROGRESS ON PREVIOUS AREAS FOR IMPROVEMENT & GOALS

We will update progress every year in our annual Modern Slavery Transparency Statement.

The following areas for improvement or goals set in 2022/23 were completed or met during 2023/24:

- ✓ Conducted a detailed review and updated our Modern Slavery and Human Trafficking Policy.
- ✓ Developed a supply chain heat mapping process to identify the highest modern slavery risks within our supply chains.
- ✓ Agreed the organisation's governance structure for modern slavery within the business and its supply chains and clarify relevant roles and responsibilities.
- ✓ Assigned mandatory modern slavery training to all direct employees through our eLearning portal.
- ✓ Became a Partner of the Supply Chain Sustainability school, onboarded our key partners and allocated our Modern Slavery Learning Pathway to our key supply chain partners.
- ✓ Increased our participation in fundraising activities with charities / organisations that support victims of modern slavery.
- ✓ Developed further methods of employee awareness and communications around the modern slavery topic – through communications and news posts on our new Group Hub site and encouraging participation in the Ride4Freedom fundraising event.

The following areas for improvement or goals set in 2022/23 were partially completed or started in 2023/24:

- Began measuring and monitoring the completion rates of modern slavery training across our employees.
- Began monitoring our supply chain completion rates of our Modern Slavery Learning Pathway.

In addition to the goals set in 2022/23 we have also:

- Created an initial, small Modern Slavery Governance Team with representatives from the Group and one of the Group's Operating companies.
- Began to outline a remediation process to support our business and supply chain should any instances of modern slavery be discovered.



AREAS FOR IMPROVEMENT & GOALS

During 2024/25 we will:

- Conduct an annual review of our Modern Slavery and Human Trafficking Policy, and update and amend this, if necessary.
- Enhance our Modern Slavery Governance structure by ensuring this support team consists of representatives from across the Group, relevant business functions and its operating companies.
- Conduct a revised heat mapping exercise to ensure this includes all of our supply chain for organisations used across the Group.
- Begin completing high level risk assessments of selected high-risk disciplines as identified from our modern slavery heat mapping.
- Continue to monitor the completion rates of modern slavery training across our employees and aim to increase the completion percentage to over 95% of all direct employees.
- Continue to onboard new supply chain partners to the Supply Chain Sustainability School and allocate our Modern Slavery Learning Pathway to our supply chain partners.
- Continue to monitor the completion rates of our Modern Slavery Learning Pathway across our supply chain and encourage them to complete these.
- Increase the number of supply chain partners completing our Modern Slavery Learning Pathway.
- Continue to develop and update any Modern Slavery awareness communications for our employees and supply chain across our sites, such as awareness posters and Toolbox Talks.
- Include Modern Slavery Awareness content within our Site Inductions.
- Deliver Modern Slavery TBTs across all our projects - recording and monitoring delivery.
- Continue to participate in activities with charities or organisations that support victims of modern slavery or work to prevent or eradicate slavery and human trafficking, such as through fundraising, modern slavery awareness campaigns or working with and supporting the SCSS' Build Environmental Against Slavery Leadership Group.

A handwritten signature in black ink, appearing to read 'Paul Burton', with a long horizontal line extending to the left.

Paul Burton
Group Chairman and Chief Executive