

Modern Slavery Act 2015

Modern Slavery Statement

September 2026

Introduction

Trading ethically, sourcing responsibly, and preventing modern slavery within our organisation and supply chain is a fundamental part of our values. We believe it is our responsibility to take meaningful action to combat this abuse of human rights – and to be transparent about both our progress and the areas in which we are still developing.

This statement outlines the key activities we have undertaken during the past financial year. It details our governance structure, risk assessment processes, due diligence activities, training programme, and our goals for continuous improvement. It is structured in accordance with the six reporting areas set out under Section 54(5) of the Modern Slavery Act 2015 and the updated Transparency in Supply Chains (TISC) Statutory Guidance, published by the UK Home Office in March 2025.

Our definition of modern slavery aligns with the International Labour Organisation (ILO) and includes forced labour, debt bondage, human trafficking, servitude, and child labour.

Our organisation & business

This statement applies to TP Bennett LLP (referred to as 'TP Bennett' or 'the Group') and its group undertakings as they existed during the financial year 01 April 2025 – 31 March 2026 (the 'reporting period'), including TP Bennett Services Limited and TP Bennett Bluehaus, the design and engineering business acquired in May 2025, which operates across the UAE and Saudi Arabia.

We are a leading international design practice delivering architecture, interiors, and planning consultancy. With a group turnover of approximately £61 million (audited accounts awaiting publication) in the last financial year, we operated from studios in London, Manchester, and Leeds in the UK, and from studios in Dubai, Abu Dhabi and Riyadh through TP Bennett Bluehaus.

The integration of TP Bennett Bluehaus into the group's governance, operations and systems has been an organisational priority throughout this reporting period. Significant foundations have been laid; the work continues into the next period and is described throughout this statement.

Our supply chains

We recognise that our greatest exposure to modern slavery risk lies within our supply chains. In line with the TISC guidance, we map our supply chains across three areas:

- **Primary value chain:** The professional services we deliver for our clients, including architecture, interiors, and planning consultancy – and the specialist sub-consultants who support that work (e.g. engineers, specialist designers & advisors, surveyors, etc.)
- **Secondary value chain:** The goods and services that support our business operations, including facilities management (cleaning, catering, etc.), office equipment & supplies, and IT hardware

- **Labour supply chain:** Our staff and contractors. We directly employ all of our staff in the UK, UAE and Saudi Arabia. We recognise the risk within the labour supply chains of our contractors, particularly in their recruitment of workers for facilities management services

We acknowledge that visibility beyond our tier 1 supply chain remains a challenge. A continuing goal is to work with our key consultants and suppliers to better understand their own supply chains, and to continue the development of ADLib (our digital library and supplier sustainability charter) to progressively extend our due diligence reach.

TP Bennett Bluehaus – UAE & Saudi Arabia:

Supply chain mapping and assessment of TP Bennett Bluehaus operations is underway as part of the group integration programme. Initial conversations have taken place regarding third-party supply chain management systems and processes. A formal supply chain map and risk assessment will be completed and reported in the next statement.

Our policies

Our Modern Slavery policy is a cornerstone of our commitment to act with integrity. Responsibility is held at board level and delegated to our Modern Slavery Prevention Committee. This policy is supported by a framework of procedures that embed our ethical standards into our operations, and which are communicated to all staff through our TP Bennett Academy staff intranet and induction programme:

- **Alignment to recognised standards:** We align our business operations to the UN Sustainable Development Goals, which include the protection of labour rights and responsible supply chain stewardship
- **Employee protections:** We verify all employees' right to work in the UK and ensure that they are paid into a personal bank account held in their own name. We pay everyone at or above the Real Living Wage. We are a certified Living Wage Employer, a standard we are actively working to extend to relevant contractors under the terms of our certification
- **Information sharing:** We provide staff with industry-specific compliance and management updates and awareness training through the TP Bennett Academy, which includes matters related to the prevention of modern slavery
- **Whistleblowing policy:** We provide a clear and confidential process for employees to report any concerns without fear of retaliation
- **Responsible purchasing:** Our procurement processes reflect that ethical considerations (not just cost) are a primary factor in supplier selection. We operate a third-party management process that verifies our professional services consultants' compliance under the Modern Slavery Act, which continues to be rolled out under a phased programme

- **Supplier Code of Conduct:** Our Supplier Code of Conduct has been developed during this reporting period and will be included in the third-party management process. It requires suppliers and sub-consultants to adhere to our ethical standards, including fair wages, prohibiting worker-paid recruitment fees, and ensuring freedom of association and movement

TP Bennett Bluehaus operates to exemplary standards in its business ethics, recruitment, and employment practices. Our commitment across the group is to use UK standards as a benchmark, which is in line with the TISC guidance on overseas branches and subsidiaries of UK-registered organisations, as well as adhering to all local legislative requirements.

Risk assessment & management

In line with the TISC guidance, we conduct an annual risk assessment focused on potential harm to people. Our Modern Slavery Prevention Committee is responsible for reviewing and managing risks.

Our methodology assesses risk across five areas – sector, geography/ jurisdiction, commodity, supply chain type, and supplier relationships – taking into account the vulnerability of workers, the complexity and opacity of supply chains, and the leverage we have to drive improvement.

We have identified and assessed areas of modern slavery risk as follows:

1. **Supplier & commodity risk – Medium to high:** We have long-standing, trusted relationships with the majority of the consultants and suppliers with whom we work. The highest risk in our UK operations remains in our operational supply chain, specifically in services that rely on low-wage or migrant labour, such as cleaning. There is a recognised risk in the manufacturing of commodities such as electronics, furniture, carpet, and other building and interiors products, where supply chains can be complex and opaque. Our in-house digital library, ADLib, continues to mitigate this risk by requiring suppliers to adhere to a responsible sourcing charter.
2. **Sector risk – Medium:** While we are designers and not builders, we operate within the higher-risk construction industry. Our influence, and therefore our risk, is associated with the materials, products, and labour practices of the supply chains underpinning what we specify for our projects.
3. **Jurisdiction risk – Medium to high (elevated from previous period):** With the integration of TP Bennett Bluehaus, our geographic footprint now includes the UAE and Saudi Arabia. These are regions that carry elevated modern slavery risk, particularly in relation to labour migration, the recruitment of migrant workers, and associated risks such as worker-paid fees and document retention. We have elevated our jurisdiction risk rating accordingly. A formal risk assessment of TP Bennett Bluehaus operations, supply chains, and geographic context will be undertaken and reported in the next period.

Due diligence processes & remediation

Our due diligence process is risk-based and people-centred. We note the TISC guidance's clear position that audits alone should not be relied upon to identify modern slavery risks, and must be supplemented by worker voice and engagement mechanisms. The following activities were undertaken during this reporting period:

- **Sub-consultant onboarding audit:** We continued our phased audit of incumbent and new sub-consultants (>£50k contract value) to verify compliance against the Common Assessment Standard (CAS) questionnaire, which is a standard prequalification route within the construction industry that includes question sets covering the prevention of modern slavery and reporting & grievance processes
- **Supplier Code of Conduct:** Our new Supplier Code of Conduct has been developed and will be integrated into new contracts. Key provisions include the prohibition of worker-paid recruitment fees, ensuring freedom of association, establishing fair wage standards, and setting minimum expectations for safe and healthy working conditions
- **Responsible recruitment:** We recognise the particular risk associated with labour recruitment, especially for migrant and low-wage workers. Our Supplier Code of Conduct explicitly prohibits worker-paid recruitment fees. We expect our facilities management contractors to uphold equivalent standards within their own recruitment practices
- **Worker voice & grievance:** Effective grievance mechanisms are a central element of modern slavery prevention. We have had initial conversations with our key facilities management contractors on the payment of the Real Living Wage. As a certified employer with the Living Wage Foundation, we are planning to develop more structured worker voice and grievance mechanisms for supply chain workers, distinct from our internal grievance and whistleblowing policies. This will be a goal for the next period and will include ensuring that our contractors' workers are aware of their rights and have access to effective reporting channels
- **Use of leverage:** We recognise our responsibility to use our commercial relationships as a positive lever for change. Where consultants, contractors or suppliers are found to fall short of our standards, our preference is to engage collaboratively and support improvement. We believe that responsible engagement – rather than immediate *dis*engagement – is more likely to lead to better outcomes for vulnerable workers

TP Bennett Bluehaus integration:

Initial conversations have taken place with TP Bennett Bluehaus senior management, departmental heads, and integration steering committees on third-party supply chain management, due diligence processes, and the most effective approach to system integration. Modern slavery prevention will be a core component of all future third-party due diligence processes across the expanded group.

Our approach to remediation

Our commitment to a victim-centred approach is universal. We will extend this remediation framework to our new operations, ensuring it is adapted to local legal and cultural contexts while upholding international standards. If an incident is identified, our process would first be to call in expert advisory and, with their support:

1. **Prioritise safety:** Ensure the immediate safety and well-being of the affected individual(s), including referral to specialised advisory support.
2. **Investigate:** Conduct a thorough investigation with all parties involved to understand the root cause.
3. **Remediate harm:** Work with all parties to create a corrective action plan focused on remediation (e.g., repayment of recruitment fees, improving working conditions, etc.).
4. **Responsible disengagement:** Terminating a contract is a last resort, used only after failed remediation attempts or in cases of severe exploitation, and only after considering the potential impact on affected individuals.

Training

To embed awareness across the practice, we have delivered mandatory online learning and guidance to all UK-based staff, covering the fundamentals of modern slavery, how to identify warning signs, and how to report concerns. This will be continued as an annual compliance training requirement. During this reporting period:

- Mandatory modern slavery awareness training was delivered to all eligible UK staff, with over 85% completing the session during the period. Completion of outstanding training is actively managed and monitored by our People & Culture team, in liaison with the Modern Slavery compliance lead
- An adapted modern slavery awareness module has been developed and integrated into the onboarding programme for all new UK starters
- Modern slavery awareness has been incorporated into integration activities with TP Bennett Bluehaus, including initial engagement with senior management and departmental heads

Our aim is to build and maintain awareness and understanding of modern slavery for all of our people, whether they encounter it in the course of their work or in their private lives, and to ensure that they know what to do if they have concerns. Priorities for the next period include extending role-specific training to procurement and project management staff, and delivering locally adapted awareness training for TP Bennett Bluehaus staff.

Our effectiveness in combating modern slavery & human trafficking

We have not received any reported concerns related to modern slavery in our own operations during this reporting period. In line with the TISC guidance, we acknowledge that an absence of reported concerns does not necessarily indicate the absence of risk – it may also reflect gaps in visibility or awareness. Our ongoing investment in training, worker voice, and due diligence systems is designed to improve detection capability and make it safe and easy for people to speak up.

We do not currently publish specific key performance indicators (KPIs) for our modern slavery prevention activities, which is a deliberate and considered decision. Given the significant expansion of the group through the TP Bennett Bluehaus acquisition, and the need for our monitoring systems and baseline data to mature before meaningful achievement and measurement is possible, we believe it would not serve the spirit of the TISC guidance to publish KPIs before they can be tracked with integrity. Developing and publishing our first set of outcome-focused KPIs – in line with TISC expectations – is a goal for the near future.

Progress on previous period's goals:

Goal	Status
Reviewed, updated & republished our Modern Slavery policy	Complete
Supplier Code of Conduct developed and integration into new contracts commenced	Complete
Continued phased rollout of supply chain management and sub-consultant audit programme	Ongoing
Online awareness training delivered to over 85% of UK staff	Complete
New starter induction module developed	Complete
Continued to engage with initiatives in our profession and the wider construction industry who develop best practice in this area (Stronger Together, Living Wage Foundation)	Ongoing
Commenced TP Bennett Bluehaus integration around modern slavery prevention – initial meetings with senior leadership, departmental heads, and steering committees	Complete
Annual modern slavery risk assessment introduced across expanded group	UK complete; TP Bennett Bluehaus formal assessment in progress
Formal risk assessment of TP Bennett Bluehaus	In progress – to be completed in next period

Goals for the next period

Building on our progress, we commit to the following steps during the next reporting period:

- Review and, where appropriate, integrate the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises, both of which are referenced in the TISC guidance as foundations for responsible supply chain stewardship
- Complete a comprehensive, documented risk assessment of TP Bennett Bluehaus operations and supply chains covering sector, jurisdiction, commodity, and supplier risk

- Begin the review, development and implementation of third-party due diligence processes, including a Supplier Code of Conduct, for TP Bennett Bluehaus and incorporating modern slavery prevention
- Roll out adapted modern slavery awareness training to all TP Bennett Bluehaus staff, and thereafter, continue to deliver scheduled compliance training and inductions for all staff across the expanded group
- Help to develop worker voice and grievance mechanisms for supply chain workers, beginning with our facilities management supply chain in the UK
- Continue improving visibility beyond tier 1, engaging key suppliers and consultants on their own supply chain management practices – in collaboration with our ADLib team
- Review, update, and republish our Modern Slavery policy annually, including timely submission to the UK Government's Modern Slavery Statement Registry
- Continue to engage with industry initiatives and best practice bodies

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the financial year ending 31 March 2026.

It was approved by the main board on 21 September, 2026.

It will be next reviewed in September 2027.



Nenad Manasijevic
Principal Director



Mark Davies
Principal Director

Date: 25 September 2026