



Modern Slavery Transparency Statement 2022/2023

SCOPE

This statement explains what steps Briggs & Forrester took in 2022/2023 (from 1st November 2022 to 31st October 2023) to identify, prevent and mitigate modern slavery in our operations and supply chains.

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's 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 £200 million, directly employees more than 730 people and 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. According to research nearly one fifth of modern slavery victims in the private sector globally are being exploited in construction.

Each year we spend around £190 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.

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.

In October 2023, the Group revised its Modern Slavery and Human Trafficking Policy and Sustainability and Whistleblowing SeeHearSpeakUp Policies.

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

We utilise SafeContractor Assessments to collate evidence of Modern Slavery Statements within our supply chain.

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.

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).

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

We have continued to allocate Modern Slavery awareness training across our Engineering Services' Procurement and Operational Teams through our eLearning platform and Supply Chain Sustainability School modules.

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, during the period the Group Board agreed a proposal which included becoming a Supply Chain Sustainability School Partner, so that we can develop a B&F Modern Slavery Learning Pathway to allocate to our supply chain.

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.



During this period, Briggs & Forrester Engineering Services Ltd and Briggs & Forrester Living Ltd continued with implementation of project information digitisation using Autodesk Construction Cloud (ACC). ACC is starting to give us the facility to digitally record our project teams' completion of Toolbox Talks, beginning a more effective and efficient way to record the delivery of Modern Slavery Toolbox Talks at site level. The first Toolbox Talks delivered and recorded through ACC were completed in October 2023 at our Kings Quarter Forum project in Bristol by our supply chain supervisors to their operatives.

AREAS FOR IMPROVEMENT & FUTURE GOALS

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

During 2023/24 we will:

- Conduct a detailed review and update of our Modern Slavery and Human Trafficking Policy.
- Refine the organisation's governance structure for modern slavery within the business and its supply chains and clarify relevant roles and responsibilities.
- Develop a supply chain heat mapping process and conduct mapping exercises to identify the highest modern slavery risks within our supply chains.
- Begin completing high level risk assessments of selected high-risk disciplines as identified from our modern slavery heat mapping.
- Assign modern slavery training modules to all direct employees through our eLearning portal.
- Monitor the completion rates of modern slavery training across our employees.
- Become a Partner of the Supply Chain Sustainability school, onboard our key partners and allocate B&F's Modern Slavery Learning Pathway to our key supply chain partners.
- Monitor the completion rates of our Modern Slavery Learning Pathway across our supply chain.
- Update our Modern Slavery Toolbox Talk.
- Continue to improve processes to effectively record and capture Modern Slavery TBTs at site level.
- Develop further awareness and communications initiatives to raise our employees and supply chain awareness of modern slavery.
- Develop remediation processes to support our business and supply chain should any instances of modern slavery be discovered.
- Increase participation in fundraising activities with charities or organisations that support victims of modern slavery.

Paul Burton
Group Chairman and Chief Executive