Modern Slavery Transparency Statement 2024/2025

SCOPE

This statement explains that steps that Briggs & Forrester took in 2023/2024 (from 1st November 2024 to 31st October 2025) 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 identify modern slavery risks, the mitigation, due diligence and remediation processes that we have implemented.

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, and Briggs & Forrester Special Projects Ltd. *It is noted that Briggs & Forrester owned and operated Building Services Maintenance for only one month of this financial year. The business has since left the Group and is no longer under our ownership or control. Accordingly, this statement reflects our modern slavery governance, due diligence measures and future plans as they apply to the continuing operations of the remaining companies within the Briggs & Forrester Group.*

CONTEXT

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

The Group's consists of three building services engineering installation and project management companies.

All Group companies operate within the UK, with a Head Office in Northamptonshire and satellite offices in London, Birmingham, Warrington, Bristol, and Leeds.

The Group has an annual turnover of more than £240 million, with around 800 directly employed staff, and employ 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 industry structural challenges, 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 the Group spend around £157 million within its supply chain, which consists of over 400 companies including suppliers of construction and MEP materials, labour, agency staff and specialist subcontractors used to design, build, install, test and commission its client's buildings.

The Group's key supply chain spend is with UK registered companies, although many 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 industry 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.

We conducted a thorough review of our Modern Slavery and Human Trafficking Policy and republished this in August 2025. This policy is supported by other policies including our Whistleblowing SeeHearSpeakUp Policy (revised in January 2025), Sustainability Policy and Code of Conduct Disciplinary Procedure.

The Group Code of Conduct & Disciplinary Procedure supports our Modern Slavery and Human Trafficking Policy by setting out clear standards of conduct from our employees.

We developed and published our Ethical Labour Policy and Ethical Labour Principles in late 2024/25. These documents were introduced to formalise the organisation's approach to ethical employment practices and to provide clear guidance for employees and supply chain partners. External communication and wider rollout of these documents is planned for the 2025/26 financial year.

RECRUITMENT & RIGHT TO WORK CHECKS

The Group's 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 utilises SafeContractor to evaluate our supply chain. Completed SafeContractor Assessments of our supply chain show that 100% of those required to have produced Modern Slavery Statements, which is 81% of those assessed. Many of our supply chain SMEs have taken steps to produce Modern Slavery Statements despite falling below the legal threshold.

In addition to SafeContractor assessments, we conduct supply chain vetting using our Supply Chain PQQ process. During 24/25, 230 PQQs were completed by our supply chain partners. The PQQ responses received show that 205 have a Modern Slavery Policy and that the remaining are SMEs that fall below the threshold requirement. None of the supply chain vetted in the 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 the Group's supply chain, unless they can demonstrate that they have (with our support where appropriate and if required) taken measures to remedy the failure and prevent recurrence. (*Further details are given within our Modern Slavery & Human Trafficking Policy*).

ORGANISATIONAL GOVERNANCE STRUCTURE

Accountability and responsibilities for delivering against the Group's commitments have been assigned by the Group Board to our internal Modern Slavery Governance Team.

The Governance Team consists of the Group Head of Sustainability and ascribed Modern Slavery Champions, who are supported by relevant leads in each of the Group's businesses. These leads include representatives from commercial / procurement and recruitment and payroll functions.

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

SUPPLY CHAIN MAPPING & RISK ASSESSMENT

During the period, the Group initiated an update of its supply chain heat-mapping to reassess the procurement categories and disciplines presenting the highest potential risks of modern slavery within its operations. This review commenced in 2024/25 but was not fully completed within the reporting period.

The supply chain heat map review was not completed during the reporting period as additional supplier data was required to ensure the updated heat map is accurate, evidence-based and reflective of the Group's current supply chain profile; in addition resources were prioritised toward the development and implementation of our new ethical labour policies, supply chain ethical audits, and internal training initiatives, which were critical to strengthening the Group's broader labour governance framework.

Our Modern Slavery Risk Assessments process will be applied to the newly prioritised categories once the updated heat map is finalised during the next financial year.

REPORTING

The Group's Whistleblowing Policy is supported by 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).

The Group's Modern Slavery & Human Trafficking Policy, toolbox talks, and site posters communicate the above mechanisms, in addition to providing details for contacting the GLAA or the police.

Whilst during the period there have been no known, suspected or reported occurrences of modern slavery within the business and its supply chain, we acknowledge that there may still be undiscovered instances within the business and its supply chain. Therefore, we continually look enhance our due diligence and reporting processes, and to increase awareness of modern slavery among our employees and supply chain.

TRAINING & AWARENESS

All Group direct employees (except non-managerial site staff) are assigned mandatory modern slavery awareness training through the Group's eLearning platform. During the period an additional 388 employees completed awareness training or retraining. As of 31st October 2025, 84% of all employees with this training assigned had successfully completed this eLearning.

The Group recognises that as much of its work is subcontracted that it needs to develop its supply chains' understanding and awareness of modern slavery. Therefore, it has developed the B&F Modern Slavery Learning Pathway which includes five Supply Chain Sustainability School modules, which is assigned to key supply chain partners to complete. At the end of the period, 32 supply chain partners had completed our Modern Slavery Learning Pathway.

Non-managerial site staff and indirect site staff are made aware of relevant modern slavery issues via project site inductions. Our TBT93 Modern Slavery Toolbox Talk was updated in July 2025 and continues to be delivered to workers across all its construction projects to reinforce modern slavery awareness in addition to our induction content.

REMEDIATION

During the previous reporting period, the Group included outline processes for remediation where any instances of modern slavery are identified. *(Refer to Briggs & Forrester Group's Modern Slavery and Human Trafficking Policy for full details).*

PARTNERING TO SUPPORT THOSE AFFECTED BY MODERN SLAVERY

During 2024/25, the Group did not undertake specific partnership initiatives or direct support activities for individuals affected by modern slavery, as organisational resources were directed towards other established charitable commitments during the period. However, the Group remains committed to strengthening its role in wider efforts and has identified opportunities to develop partnerships and initiatives in the next financial year.

AREAS FOR IMPROVEMENT & FUTURE GOALS

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

The following areas for improvement or goals set were completed or met during 2024/25:

- ✓ Conducted an annual review and update of our Modern Slavery and Human Trafficking Policy.
- ✓ Continually measured, monitored, and internally reported staff completion rates of mandatory Modern Slavery Training.
- ✓ Updated Site Inductions to include modern slavery awareness content.
- ✓ Continually measured, monitored, and internally reported our supply chain completion rates of our SCSS Modern Slavery Learning Pathway allocated to partners.
- ✓ Continued to be a Partner of the Supply Chain Sustainability school and work within the School's Built Environment Against Slavery (BEAS) Leadership Group.
- ✓ Continued to develop, enhance, and update Modern Slavery awareness communications through updated awareness posters, Toolbox Talks, and hosting a modern slavery lived experience webinar with the Supply Chain Sustainability School.
- ✓ Developed an Ethical Audit Plan for supply chain partners and conducted our first ethical audit with a labour agency within its supply chain.

In addition to the previous goals set the Group has also:

- ✓ Participated and supported the work of the SCSS' BEAS Leadership Group to develop the SCSS' new Modern Slavery Assessment for organisations – work for which the SCSS BEAS Group was recognised and awarded the Collaboration award by Unseen.

The following areas for improvement or goals were partially competed or started in 2024/25:

- Review and update of our supply chain heat map.

During 2025/26 the Group 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 operating companies.
- Complete the revision of our supply chain heat map to ensure this includes comprehensive supply chain coverage for organisations used across the Group.
- Begin completing high level risk assessments of selected high-risk disciplines as identified from our revised modern slavery heat mapping.
- Continue to monitor the completion rates of modern slavery training across our employees – aiming for completion rates of over 95% for all direct employees.
- Continue to onboard new supply chain partners to the Supply Chain Sustainability School, allocate our Modern Slavery Learning Pathway, monitor completion rates and encourage their completion.
- 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.
- Enhance the existing Modern Slavery Awareness content within our Site Inductions.
- Continue to deliver Modern Slavery TBTs across all our projects - recording and monitoring delivery.
- Develop an audit schedule for ethical labour audits of supply chain partners and increase the number of audits conducted – concentrating on high-risk areas.
- Continue to participate in activities with charities or organisations that support victims of modern slavery or work to prevent or irradicate 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.

Paul Burton
Group Chairman and Chief Executive