Modern Slavery and Human Trafficking Policy

1. Introduction

1.1 This policy applies to 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.

1.2 The Group delivers building engineering services throughout the UK, including design, installation, project management, testing and commissioning. Our projects span the public and private sectors, including education, healthcare, government, commercial, industrial and residential developments.

1.3 The Group is committed to responsible business practices and continual improvement through its HSEQS Management Framework, which provides the structure for achieving our objectives. This policy supports our commitment to a Sustainable, Compliant & Ethical Supply Chain, promoting human rights, fair labour practices, ethical business conduct and the prevention of modern slavery.

1.4 The Group acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to maintaining transparency throughout its operations and supply chain.

1.5 We support the United Nations Sustainable Development Goal 8.7 and are committed to helping eradicate forced labour, modern slavery and human trafficking.

1.6 The Group recognises that modern slavery risks can arise within both its operations and supply chains and is committed to applying a risk-based approach to their identification, prevention, mitigation and remediation.

2. Commitments

2.1 The Group is committed to:

- Upholding human rights and fair labour practices.
- Preventing modern slavery, forced labour and human trafficking within our operations and supply chain.
- Promoting ethical business conduct, transparency and accountability.
- Complying with applicable legal, regulatory and contractual requirements.
- Encouraging employees and supply chain partners to identify and report concerns.
- Continually improving our approach to managing modern slavery risks.
- Respecting internationally recognised human rights and taking reasonable steps to identify, prevent and mitigate adverse human rights impacts.

2.2 Modern slavery prevention is embedded within our HSEQS Responsible Business Strategy through our Sustainable, Compliant & Ethical Supply Chain commitment.

2.3 The detailed objectives, controls and action plans supporting these commitments are defined within our management systems, associated policies, procedures and annual Modern Slavery Transparency Statement.

2.4 Performance, risks, objectives and controls will be reviewed periodically to support continual improvement in the prevention and mitigation of modern slavery risks.

3. Delivering Our Commitments

3.1 The Group Board will provide oversight and resources to support the implementation of this policy.

3.2 The Head of Sustainability will oversee the implementation of the Group's modern slavery programme, including governance, due diligence, objectives, reporting and continual improvement activities.

3.3 Delivery will be supported by the Modern Slavery Governance Team, comprising representatives from Sustainability, Procurement, Commercial, Recruitment and Payroll functions across the Group.

3.4 The Modern Slavery Governance Team is responsible for supporting the identification, assessment and management of modern slavery risks within the business and supply chain.

3.5 Managers responsible for procurement, recruitment and payroll activities shall implement appropriate controls within their areas of responsibility.

3.6 All employees, suppliers, subcontractors, labour agencies, consultants and anyone working on behalf of the Group are responsible for complying with this policy and reporting any suspected instances of modern slavery or human trafficking.

3.7 The prevention, detection and reporting of modern slavery is the responsibility of everyone working for or on behalf of the Group.

4. Risk Management and Due Diligence

4.1 The Group will adopt a risk-based approach to identifying, assessing and managing modern slavery risks within its operations and supply chain.

4.2 Supply chain heat mapping will be undertaken to identify procurement activities, sectors and geographical locations that may present elevated risks of modern slavery.

4.3 Heat mapping activities will be reviewed periodically and when significant changes occur to the Group's operations, supply chain or risk profile.

4.4 Risk assessments will consider factors including procurement category, spend levels, nature of goods and services, manufacturing or service delivery location, known industry risks, and geographic risk indicators.

4.5 A risk-based approach will be used to determine priority areas for further assessment and the implementation of appropriate controls.

4.6 Detailed Modern Slavery Risk Assessments will be completed for identified high-risk supply chain categories and will include identified risks, existing controls and proposed improvement actions.

4.7 As part of our due diligence activities:

- Supplier approval processes will include consideration of modern slavery risks and controls.
- Contracts will contain clauses outlining expectations regarding compliance with the Modern Slavery Act 2015.
- Labour providers and recruitment activities will be subject to appropriate checks and controls.
- Right-to-work checks will be undertaken for all direct employees

4.8 The Group will undertake due diligence in relation to:

- Suppliers and subcontractors
- Labour providers and recruitment agencies
- High-risk procurement categories
- New business relationships where appropriate

5. Reporting and Remediation

5.1 The Group encourages employees, suppliers and other stakeholders to report any concerns relating to modern slavery or human trafficking.

5.2 Concerns may be raised through management, the Group's Whistleblowing (SeeHearSpeakUp) arrangements or relevant external organisations.

5.3 The Group will maintain appropriate mechanisms that enable employees and external stakeholders to raise concerns confidentially and without fear of retaliation.

5.4 Reports and concerns will be investigated appropriately by the Group and escalated where necessary.

5.5 The Group Board, supported by the Modern Slavery Governance Team, will oversee the review and implementation of any remediation actions arising from identified instances of modern slavery.

5.6 Where modern slavery is identified within the supply chain, the Group will seek appropriate corrective and preventative actions and may suspend or terminate business relationships where appropriate.

5.7 The Group recognises that effective remediation is often achieved through engagement and collaboration with suppliers and will seek to support corrective actions and continuous improvement wherever appropriate.

5.8 Employees found to have participated in, facilitated or knowingly ignored modern slavery activities may be subject to disciplinary action, up to and including dismissal.

5.9 The Group will seek to ensure that identified victims are signposted to appropriate support organisations and services.

5.10 Where instances of modern slavery are identified, the Group will seek to support effective remediation that prioritises the safety, wellbeing and rights of affected individuals.

5.11 Details of reporting channels and support organisations are provided within associated procedures, guidance and awareness materials.

6. Supply Chain Due Diligence

6.1 The Group expects suppliers, subcontractors, labour providers and other business partners to uphold the standards set out within this policy.

6.2 The Group will engage with suppliers to promote good labour practices, ethical working conditions and continual improvement.

6.3 Where appropriate, suppliers may be requested to:

- Provide evidence of their modern slavery controls.
- Publish a Modern Slavery Statement.
- Complete relevant training or awareness programmes.
- Cooperate with audits, assessments or investigations.

6.4 The Group reserves the right to review supplier performance and take appropriate action where concerns are identified.

6.5 Suppliers identified as presenting elevated modern slavery risks may be subject to enhanced due diligence, monitoring, engagement or corrective action plans.

6.6 The Group recognises that sustainable improvements are best achieved through collaboration and will work with suppliers to strengthen controls and improve labour standards where risks are identified.

7. Responding to Modern Slavery Concerns

7.1 Any employee, supplier or other stakeholder who suspects or identifies modern slavery, human trafficking or forced labour associated with the Group's operations or supply chain must report their concerns as soon as possible.

7.2 Concerns may be raised through line management, the Group's SeeHearSpeakUp reporting arrangements, the Sustainability Team or any other appropriate reporting channel.

7.3 All concerns will be treated seriously and investigated appropriately. Where required, matters will be referred to relevant law enforcement agencies, regulators or specialist organisations.

7.4 The Group is committed to protecting individuals who raise concerns in good faith and will not tolerate retaliation against any person reporting a suspected breach of this policy.

7.5 Where modern slavery risks or incidents are identified within the supply chain, the Group will work with the relevant supplier to understand the circumstances and implement appropriate corrective and preventative actions. The Group reserves the right to suspend or terminate business relationships where risks are not adequately addressed.

7.6 Those found to have breached this policy must provide evidence that includes a summary of the circumstances and any remedial action that has taken place. The evidence provided shall, as a minimum, prove that they have:

- paid or undertaken to pay compensation in respect of any damage caused by the criminal offence or misconduct,
- clarified the facts and circumstances in a comprehensive manner by actively collaborating with the investigating authorities, and
- taken concrete technical, organisational and personnel measures that are appropriate to prevent further criminal offences or misconduct.

7.7 The remedial measures taken shall be evaluated, which will consider the gravity and particular circumstances of the criminal offence or misconduct. Where the measures are considered insufficient, a statement of the reasons for that decision will be given.

7.8 Any employee found to have participated in, facilitated or knowingly ignored modern slavery or human trafficking activities may be subject to disciplinary action, up to and including dismissal, and where appropriate, referral to law enforcement authorities.

7.9 The Group will seek to ensure that identified victims are protected and directed to appropriate support services.

7.10 Anyone requiring advice or wishing to report concerns may contact:

- SeeHearSpeakUp (confidential whistleblowing service) – *See Whistleblowing Policy*
- Modern Slavery & Exploitation Helpline: 08000 121 700
- Gangmasters & Labour Abuse Authority (GLAA): 0800 432 0804
- Emergency Services: 999 where there is an immediate risk to life or safety
- The Salvation Army (victim support services in England and Wales)

8. Monitoring, Measuring and Reporting

8.1 The Group will monitor and review the effectiveness of its modern slavery controls, due diligence activities and training programmes.

8.2 Performance indicators may include:

- The percentage of eligible suppliers publishing a Modern Slavery Statement.
- The number and percentage of suppliers completing modern slavery training.
- The percentage of employees completing modern slavery awareness training.
- The number of suppliers subject to due diligence reviews.
- The number of modern slavery concerns raised, investigated and resolved.

8.3 Performance will be reviewed by the Modern Slavery Governance Team and reported periodically to the Group Board.

8.4 The Group will publish an annual Modern Slavery Transparency Statement approved by the Group Board and signed by an authorised Director in accordance with applicable legislative requirements.

9. Other B&F Group Policies and Documents

- Sustainability Policy
- Code of Conduct, Disciplinary Rules and Procedure
- Bribery and Corruption Policy
- Whistleblowing: See Hear Speak Up Policy

10. Communication of this policy

10.1 A full copy of this policy is accessible to all interested parties via the Group website.

10.2 Everyone working for or on behalf of the Group are required to read and understand the requirements of this policy.

10.3 All employees are required to complete relevant training, through either site induction or via our inhouse learning management system.

10.4 Toolbox Talks are carried out on sites, covering Modern Slavery (TBT093) and Whistleblowing (TBT112), the standards to be upheld, what to look out for and what to do if there is a belief or suspicion that modern slavery or human trafficking has occurred.

11. Review and updating of this policy

11.1 This policy and all associated policies, (e.g., Sustainability Policy and Whistleblowing SeeHearSpeakUp Policy) will be reviewed and updated annually and amended as necessary to reflect any changes to the Group, its management systems, or relevant legislation.

11.2 The Group Board, in conjunction with its appointed Modern Slavery Governance Team, continually monitor this policy's procedures to ensure compliance and continual improvement. All reports, reviews and results of monitoring processes will be recorded, and records retained.

11.3 Every year, the Group will:

- Review the level of training and capacity building available to staff and upon completion implement the identified training requirements.
- Review its labour agency agreements to ensure they are up to date with the requirements of this policy.
- Review the level of support or guidance available to victims, businesses, operations or suppliers should instances of modern slavery be found, including measures to protect them from further victimisation or vulnerability.

Paul Burton
Group Chairman and Chief Executive