

## Modern Slavery Statement (Updated May 2019)

In compliance with the Modern Slavery Act 2015 (**the Act**), BMT (comprising BMT Group Limited and its subsidiaries) is committed to social and environmental responsibility in relation to slavery and human trafficking. Slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and related forms of workplace abuse. In this Statement, we use the terms “slavery and human trafficking” to include all forms of slavery, servitude and forced or compulsory labour and human trafficking.

This statement is made in respect of BMT as a whole, for the financial year ending 30 September 2018 and is an update to the statement published in October 2018. This statement fulfils the legal obligations of BMT Group Limited and BMT Defence & Security UK Limited, under section 54 of the Act, to make an annual statement indicating the steps they have taken in the preceding financial year to ensure slavery and human trafficking is not occurring in their businesses or supply chains. Actions taken on a group-wide basis have been adopted within these companies.

BMT is an international design, engineering and risk management consultancy, working principally in the maritime sector. It was established in 1985 by bringing together research and technology organisations that traced their roots back to the beginning of the 20th century. Our customers are served by around 1,400 professionals located in an international network; our head office is based in London, UK.

The parent company, BMT Group Ltd, is a member-based company limited by guarantee, with its assets held in beneficial ownership for the staff through an Employee Benefit Trust (EBT). The Trustees’ remit is to ensure the sustainability of the company.

We hold ourselves and our supply chain accountable and we fully comply with the provisions of the Act. We recognise that slavery and human trafficking is a complex supply chain issue and our Commercial Team are proactively working in partnership with our customers, suppliers and partners to identify and implement preventative checks and measures, to assure ourselves that our activities are fully accountable and compliant.

### Demonstration of our commitment

#### Employee Awareness

To ensure that our employees are made aware of the issue of slavery and human trafficking, we have produced a number of tools and publications to support awareness raising. We have created two booklets on the subject as guidance, both of which have been disseminated to all staff. These have also been made available on our company-wide intranet.

We have improved our communications regarding ethical matters, updating our intranet appropriately, and launched a new ethics e-learning course. Completion of this course is mandatory. We have also created a “Working Ethically” competency to our suite of leadership competencies which is reflected in all our leadership training and it present as part of the competencies on our global appraisal form.

Our conduct and behavioural expectations are articulated in the Ethics area of our intranet. To ensure that the leaders in our business understand the issues of slavery and human trafficking, we include the topic for discussion in our Leadership Development activities so that our senior leadership team are made more aware of the issues.

### **Assessing the Risk**

We carry out a regular review of the risk of modern slavery as part of our ethical business programme, assessing the risks in terms of the geographies and markets in which we operate, and in terms of our customers, suppliers and working methods.

### **Third Party Screening**

To ensure that we engage with partners, customers and subcontractors who share our commitments, we use a third party due diligence screening platform available for all our operating companies to use. This service alerts us to adverse publicity, prosecutions, etc. and will highlight any record of unacceptable employment practices. The service selected has been benchmarked against industry standards and its performance is monitored. Use of this tool enables us to make informed decisions regarding our third-party relationships. We now have in excess of 1500 third parties being screened, and any companies being flagged as a red risk are investigated further before business relationships are established or extended.

### **Raising Concerns**

An external hotline has been put in place, available from 1st November 2018, to enable employees to raise concerns confidentially, in the knowledge that they will be taken seriously and investigated. Those employees who raise genuine concerns, in good faith, will not be at risk of disciplinary action and will be protected from adverse consequences.

### **Violations**

BMT's disciplinary policy permits the termination of employees found to be involved in any breach of the law banning forced labour, slavery and human trafficking.

BMT is committed to maintaining and improving systems and processes to help ensure that there are no human rights violations related to our own operations or our supply chains. To that end, we will continue to update policies and procedures as required to ensure we maintain appropriate safeguards against any mistreatment of persons involved in our supply chain or our own businesses.

Approved by the Board of BMT Group Limited on 10 May 2019.



David McSweeney  
Chief Financial Officer (CFO)  
**Director, BMT Group Limited**  
**10 May 2019**

Approved by the Board of BMT Defence & Security UK Limited on 10 May 2019

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke ending in a vertical tick.

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David McSweeney  
Chief Financial Officer (CFO)  
**Director, BMT Defence and Security UK Limited**  
**10 May 2019**