

Modern Slavery & Human Trafficking Statement

This statement sets out the actions that we have taken to mitigate the risks associated with modern slavery related to our business during the financial year 2021. This statement complies with the Modern Slavery Act 2015 (the “Act”). BMT (comprising BMT Group Limited and its subsidiaries) fully supports the aims of the Act and associated standards. Our colleagues, suppliers, customers, business partners and others we work with all have responsibility to tackle slavery and human trafficking wherever they can in the course of their business.

This statement is an update to the statement published in March 2020. This statement fulfills 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 taken in the preceding financial year to ensure slavery and human trafficking is not occurring in our businesses or supply chains. Actions taken on a group-wide basis have been adopted within these companies.

We are an international design, engineering, and risk management consultancy, working principally in the maritime sector. BMT 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 type of work we do at BMT means that the risk of human trafficking or slavery occurring across our business and supply chains is low, nevertheless, we recognise that the risk still does exist. We hold ourselves and our supply chain accountable and we fully comply with the provisions of the Act. BMT recognises that slavery and human trafficking is a complex supply chain issue. Therefore, we proactively work 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, compliant and transparent.

Employee Awareness

Our Ethics and Compliance Committee oversees our Modern Slavery and Human Rights agenda to embed initiatives within our business aligned to best practice. This Committee comprises employees who represent our portfolios, global business services, and relevant business functions. The role of the committee is to mitigate any non-compliance with legislation, deliver good governance, and drive ethical business behaviors.

To raise awareness among our employees of the risks of slavery and human trafficking, we share external publications on our company-wide intranet, including the ['Practical Guide of Transparency in Supply Chains'](#).

Employee Code of Conduct

In May 2021, our Ethics and Compliance Committee introduced the Employee Code of Conduct which sets out the standards of conduct that all BMT employees are expected to meet in business. All employees (including temporary and contractual) are expected to undertake mandatory Employee Code of Conduct training via the internal performance portal every two years. This has now been embedded as part of our induction programme for all recruits.

The Employee Code of Conduct provides a confidential raising concerns hotline to ensure that employees can anonymously submit concerns regarding alleged code violations.

BMT's internal audit function checks for awareness, application, and implementation of the Employee Code of Conduct on an ongoing basis.

Assessing the Risks

We review modern slavery risks as part of our ethical business programme. We assess the risks associated with the geographies and markets in which we operate, and in terms of our employees, customers, suppliers, and working methods. We have assessed the risks of doing business using publicly available information. This data is then used to produce a risk rating for each country to influence our bid decisions.

Supply Chains

We aim to lead by example, drive best practice through our purchasing behaviours and develop commercial partnerships across the industry. Our largest suppliers are predominantly professional services- providing software, insurance, consultancy services, commercial property services, etc. Other suppliers include those who deliver services in our offices such as cleaning, maintenance, and catering. We also buy products such as promotional merchandise, ICT equipment and stationery.

In March 2021, we published a Supplier Code of Conduct. It is founded on the principles of sustainability and our ethos as a business. The Supplier code of conduct helps to ensure we can uphold the highest levels of integrity and ethical standards in every place we operate, whilst driving social, economic, and environmental improvements in our extended supply chain.

The Supplier Code of Conduct sets out the duty of all our suppliers to:

- Adhere to our Supplier Code of Conduct, which sets out the standards for doing business with us.
- Comply with all applicable laws including the Act and relevant contractual terms.
- Be aware of and seek to deliver continuous improvement in line with the UN Global Compact Ten Principles.
- Provide full and timely cooperation with reasonable requests for information, to determine the Supplier's compliance with the Code.

We require new suppliers (and existing suppliers when entering into new contracts) to sign up to our code, to verify that their working practices align with our values. They are required to communicate the Supplier Code of Conduct principles down the supply chain to supplier subcontractors and other business partners involved in supplying products and services to BMT.

Our supply chain is further assessed via our supplier onboarding questionnaire which helps us to verify that our supply chain has the necessary skills, qualifications, and working practices to trade with us. Manual due diligence checks including financial and background searches are also conducted on larger suppliers to avoid trading with businesses that participate in unethical practices.

Raising Concerns


Our employees and other stakeholders may raise a concern about possible improper, unethical, or illegal practices online, by phone, via a web portal, or by downloading an app through our external provider. We are committed to dealing with such notifications in an open and responsible manner. Those who raise genuine concerns in good faith will not be at risk of disciplinary action and protected from adverse consequences. In early July 2021, the confidential hotline provided for our employees was extended to include all BMT Suppliers.

Our Commitment

We are 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 individuals involved in our supply chain and our own businesses.

Approved by the Board of BMT Group Limited on 14 December 2021

For and on behalf of BMT Group Limited and its subsidiaries



David McSweeney

Chief Financial Officer (CFO)

Director, BMT Group Limited

14 December 2021