

## **BMT Group Ltd Modern Slavery Statement (Updated October 2018)**

In compliance with the Modern Slavery Act 2015, BMT is committed to social and environmental responsibility and has zero tolerance for 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.

The BMT group 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 of 26 subsidiary companies; our head office is based in Teddington, 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). As an EBT, only the Trustees are entitled to vote at its meetings. Their remit is to ensure that the Board acts at all times in the best interests of the staff in the short, medium and long-term.

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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 we will be working in partnership with our customers, suppliers and partners to help develop long-term solutions to this issue.

### **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.

Our conduct 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. We have introduced an International Business Matrix which ranks all countries for various criteria, one of which is the estimated amount of modern slavery. This

assessment is used to guide our staff when pursuing work, and it is updated every six months or following any significant issues in the public arena.

#### 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 1400 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

A hotline has been implemented, available from 1<sup>st</sup> 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.