

Modern Slavery Statement

(Updated 2nd March 2021)

This Statement builds on last year’s statement and explains the steps BMT has taken to help prevent, detect and respond to slavery in our business. This statement is in compliance 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. BMT is fully committed to tackling slavery and human trafficking wherever we can. This statement is an update to the statement published in April 2020. 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 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 1,300 professionals located in an international network; our head office is based in London, UK.

BMT Group Ltd is a company limited by guarantee with its assets held in trust by the EBT Trustees. The remit of the EBT is to ensure the long-term stability of the group with the employees as beneficiaries. The Chair of Trustees is Wendy Barnes. The other Trustees are a wholly independent external trustee and non-executive directors from the Board of BMT Group Ltd.

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 Modern Slavery Act. BMT recognises that slavery and human trafficking is a complex supply chain issue, and 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 and compliant.

Employee awareness

To ensure that our employees are aware of the risks of slavery and human trafficking, we share external publications on our company wide intranet, including the HMG [‘Practical Guide of Transparency in Supply Chains’](#).

There is an expectation that all employees understand the compliance requirements for wellbeing, health and safety, ethics, and cyber security, and have a clear set of guidelines on the standards they need to meet. This is reflected in our leadership competencies at Level 1 on the BMT Career Map. Our conduct and behavioural expectations are also set out in the Ethics area of our intranet and all employees are required to sign up to BMT’s Global Ethics and Anti-Bribery Policy.

To ensure that the leaders in our business understand modern slavery and human trafficking, we include the topic for discussion at our Ethics and Compliance Committee. This Committee comprises employees who represent our Portfolios, Global Business Services, and relevant business functions. The role of the Committee is to mitigate BMT’s exposure to non-compliance with legislation, deliver good governance and to drive ethical business behaviours.

Assessing the risk

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.

We are publishing a Supplier Code of Conduct, founded on the principles of sustainability and our ethos as a business. It will help ensure we can uphold the highest levels of integrity and

ethical standards in every place in which we operate, whilst driving social, economic, and environmental improvements in our extended supply chain. The Supplier Code of Conduct will set 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 Modern Slavery 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 will be asking 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 will also be 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.

Third-party screening

BMT is in the process of developing a new global Procurement Policy and Procedure, which will provide guidance on our supplier screening process.

Raising concerns

Our employees and other stakeholders may raise a concern about possible improper, unethical, or illegal practices online, by phone or by downloading the app through our external provider. BMT is committed to dealing with such notifications in an open and responsible manner and those that raise genuine concerns in good faith will not be at risk of disciplinary action and will be protected from adverse consequences.

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 persons involved in our supply chain or our own businesses.

We are currently putting in place further measures to improve our approach to modern slavery, such as a mandatory employee code of conduct e-learning module, the Supplier Code of Conduct and third-party screening processes.

We are therefore committed to further updating our Modern Slavery Statement in the coming months.

Approved by the Board of BMT Group Limited on 2 March 2021

For and on behalf of BMT Group Ltd and its subsidiaries

A handwritten signature in blue ink, appearing to read "David McSweeney", written over a horizontal dotted line.

David McSweeney

Chief Financial Officer (CFO)
Director, BMT Group Limited
2 March 2021