

Burns & McDonnell Europe (UK) Limited

Modern Slavery Act Compliance Statement

Published March 2025

This document sets out Burns & McDonnell Europe (UK)'s approach to compliance with the UK's Modern Slavery Act. As an organisation we are committed to improving our practices to combat slavery and human trafficking. Beyond our policy on modern slavery (see separate policy document) we have a clear approach to confirming compliance to the Modern Slavery Act within our own organisation and within our supply chain. We expect our people and supply chain to comply with the spirit and intent of the Modern Slavery Act.

Our Policy on Slavery and Human Trafficking

Burns & McDonnell has a zero-tolerance position on violations to the UK's human trafficking and modern slavery laws. We are committed to confirming that there is no modern slavery or human trafficking in our own business or supply chain and will act swiftly should we be made aware of any allegations or actual violations of our policy. We require our employees and supply chain partners to act ethically and with integrity in all their business dealings and relationships.

Organisation Structure

Burns & McDonnell is a global business of more than 13,000 engineers, architects, construction professionals, scientists and consultants with offices across the US and the world including the UK. Burns & McDonnell is a global provider of engineering and construction services in the civil, commercial and energy sectors. The parent company of Burns & McDonnell Europe (UK) is Burns & McDonnell Global which in turn is part of the family of global businesses within Burns & McDonnell.

The UK business is led by Kyle Roberts, Executive Managing Director, with five global practice divisions providing professional services and construction services as set out below. Each global practice is led by a Managing Director and the global practices work together to serve our clients.

1. Transmission & Distribution
2. Commercial Facilities including Mission Critical
3. Environmental Services
4. 1898 & Co. consultancy services
5. Construction Services

The Construction Services global practice is the construction execution partner for the other global practices. It contains departments typical of a UK construction business including health & safety, project management, commercial, procurement, project controls, field operations, quality and supply chain management. Each of these departments is led by a department manager with responsibility for their specific area. Currently they provide construction services within the Transmission sector, providing Engineering Procurement Construction (EPC) services for transmission utilities in the UK. The business does not employ any 'blue collar' workers or construction operatives, instead subcontracting out all physical construction activities to specialist companies in areas including civil engineering, mechanical & electrical installation, buildings and building services.

The supply chain is assessed, selected and appointed through our Supply Chain Management system (Compass) with responsibility for the system sitting with our global procurement department. Within the UK our Supply Chain Manager engages with local and global supply chain partners on behalf of the

business and individual project managers to meet the specific needs of our projects. We currently have circa 250 companies listed as potential suppliers to the UK organisation. Some of these are yet to provide services to the business and they are at different stages of approval and confirmation as 'approved' suppliers. These suppliers fall into two broad categories of material & equipment suppliers and construction subcontractors and typically have a multi-tiered supply chain drawing upon the global market.

Approach to Due Diligence for compliance to the Modern Slavery Act

Inside our organisation we undertake pre-employment checks on all employees to confirm their background and basis for employment in the UK. Where we use Contract Employees (Contingent Workers) we work with an aggregating agency that undertakes similar checks on all people provided to work in our organisation.

All organisations wishing to provide services to Burns & McDonnell are required to register on an annual basis through our Compass Supplier Management System. The Compass system requires each supplier to provide a copy of their Modern Slavery Act compliance statement and to provide evidence of how they check compliance within their own supply chain. The application to be a supplier to Burns & McDonnell is reviewed by our procurement department with any individual project specific requirements reviewed by the relevant project manager, supported by our local supply chain manager.

A risk-based approach to compliance checking

We adopt a risk-based approach to checking compliance to the Modern Slavery Act. We assess and categorise our active suppliers according to their potential exposure to modern slavery risks. This includes their scale of operations, the extent of their business and supply chain internationally, the level of spend we have with them and any red flags identified through the "CLEAR" background screening system. Those suppliers that are assessed as being within the higher risk category have a greater level of scrutiny on their compliance approach, including specific questions posed at 1to1 supplier engagement meetings and a more detailed risk assessment using contract risk screening. Where any areas of potential concern are identified we have the option to request an independent in-country audit or to undertake our own compliance audit.

Outcomes of our risk-based approach to due diligence

To date we have not identified any instances of non-compliance or any breaches of the Modern Slavery Act within our own business or supply chains. We remain vigilant, with annual renewal of supply chain accreditation and checking.

Providing guidance to our employees and Supply Chain

We require all employees and contingent workers to undertake training on compliance to modern slavery and human trafficking. This is captured within our Learning Central system and completion reports provided to people managers and escalated to their managers in the event of outstanding training. Our written Business Code of Conduct provides clear guidance to our employees and contingent workers and is provided at completion of the compliance training to the code of conduct.

We have a supply chain specific code of conduct which sets out our expectations for compliance to modern slavery and human trafficking and each supplier confirms acknowledgement of this when going through the Compass supplier accreditation process.

Whistleblowing policy and Integrity helpline

As part of our Business Code of Conduct we provide a whistleblowing helpline to report any instances of non-compliance, modern slavery and human trafficking. All allegations are thoroughly reviewed by the Compliance & Ethics department and will be formally investigated when warranted.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's slavery and human trafficking statement for the financial year ending December 31, 2024.

Signed:



Michael W. Brown
President, Burns & McDonnell Europe (UK) Limited