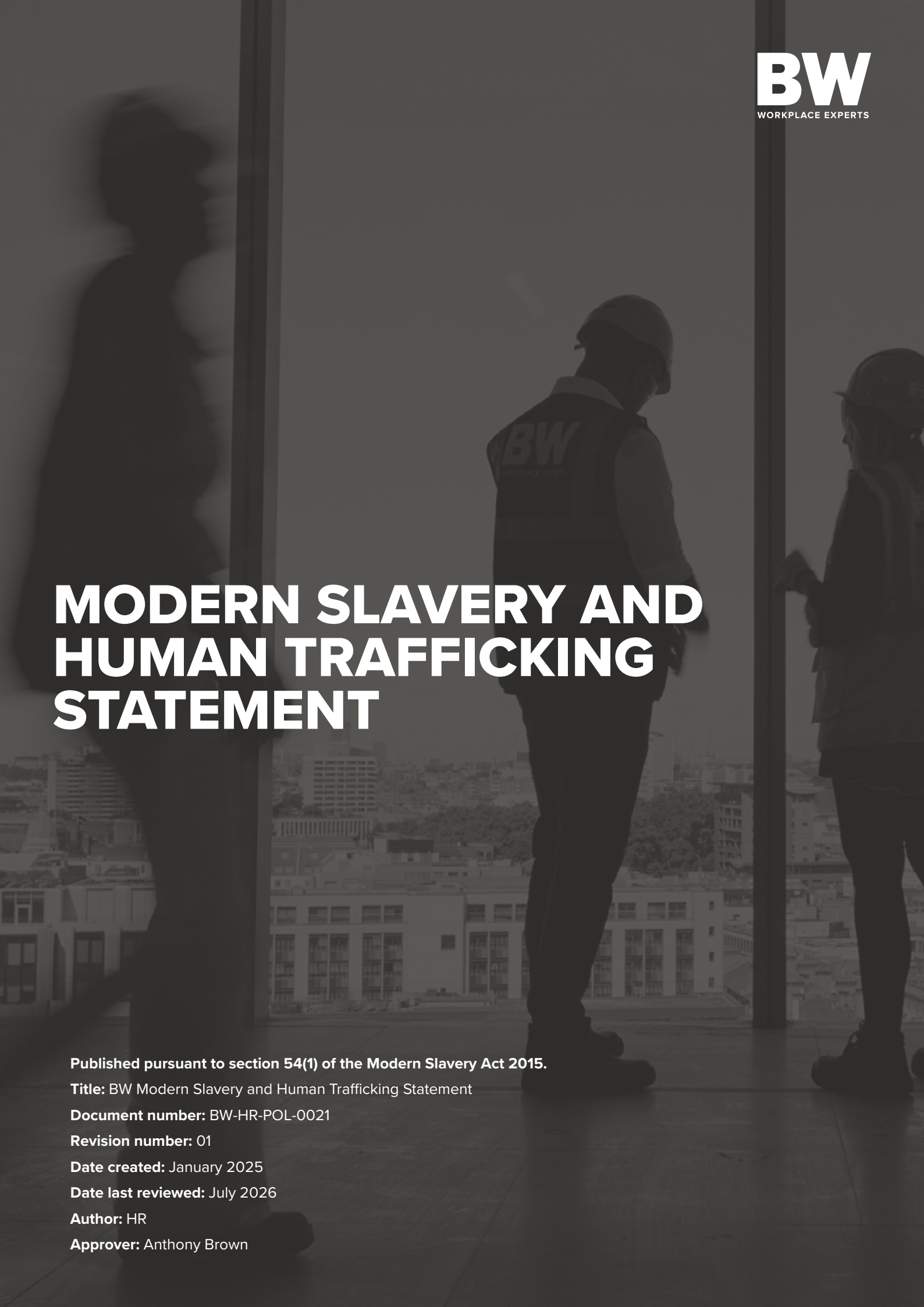




MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. INTRODUCTION AND SCOPE

This statement is made by BW Interiors Limited (“BW”, “we”, “us”) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended **31 December 2025**.

It sets out the steps we have taken during the reporting period, and the steps we will take in the year ahead, to ensure that slavery, servitude, forced or compulsory labour and human trafficking are not taking place in any part of our own business or in our supply chains.

We have zero tolerance for modern slavery, human trafficking, forced labour and labour exploitation. We recognise that construction and fit out is a sector assessed as carrying elevated risk, because of its reliance on multi-tier subcontracting, agency and self employed labour, migrant workers and globally sourced materials. We therefore treat this as an operational risk to be actively managed, not a compliance formality.

This statement is structured to address each of the six areas set out in section 54(5) of the Act and in the Home Office statutory guidance, Transparency in Supply Chains: a practical guide. It is also aligned to Procurement Policy Note 009 (Tackling Modern Slavery in Government Supply Chains) and to the Chartered Institute of Building guidance, Building a Fairer System: Tackling Modern Slavery in Construction Supply Chains.

Our commitments are informed by and consistent with:

- Modern Slavery Act 2015.
- Employment Rights Act 1996.
- Immigration, Asylum and Nationality Act 2006.
- National Minimum Wage Act 1998.
- Health and Safety at Work etc. Act 1974.
- Employment Agencies Act 1973 and the Gangmasters (Licensing) Act 2004.
- UN Guiding Principles on Business and Human Rights.
- The ILO core conventions and the Ethical Trading Initiative Base Code.

2. OUR STRUCTURE, OUR BUSINESS AND OUR SUPPLY CHAINS

(Section 54(5)(a))

2.1 OUR STRUCTURE

BW Interiors Limited is a private limited company registered in England and Wales, company number 04018003, with its head office at The Carter, 3rd Floor, 11 Pilgrim Street, London EC4V 6RN.

Our annual turnover for the reporting period was **£327m**, and we directly employed an average of **approximately 272 people**. We additionally engaged an average of **345** contingent workers (consultants, agency staff and work experience placements) during the period.

This statement is published as a group statement and covers the following organisations:

- BWI (Holdings) Limited.
- BW Interiors Limited.
- BW Workplace Experts Limited.

It is published on the UK website of BW: Workplace Experts at wearebw.com, which is the single website operated by the group and serves all three organisations named above. The commitments and processes described apply across all three.

2.2 OUR BUSINESS

BW are fit out and workplace specialists. We design, construct and refurbish commercial workplace environments, principally across London and the South East, together with associated fit out, refurbishment and workplace consultancy services.

2.3 OUR SUPPLY CHAINS

Our supply chain is predominantly UK based. We procure in three categories:

- **Subcontract trade packages:** the largest element by value and by headcount on site. These include demolition and strip out, mechanical and electrical services, drylining and partitioning, joinery, flooring, decoration, cleaning and waste management.
- **Labour providers:** recruitment agencies and labour supply businesses supplying operatives and supervisory staff to our sites and to our subcontractors.
- **Professional services and consultants:** design, engineering, surveying and specialist advisory services.

We do not procure materials or manufactured products directly. Furniture, flooring, ceilings, glazing, ironmongery, IT and AV equipment and other finishes are purchased by our subcontract trade partners as part of their packages. Those goods nonetheless form part of our supply chain for the purposes of section 54 and we recognise that the underlying manufacture and raw material extraction can extend into jurisdictions carrying a higher risk of forced labour.

Because we do not hold the commercial relationship with those manufacturers, our influence over this part of the chain is indirect. We exercise it through our subcontract terms and through what we require of our trade partners, rather than through direct supplier management. We consider it more honest, and more effective, to be clear about where our leverage genuinely sits than to imply a level of direct control we do not have.

During the reporting period we paid approximately **542** subcontractor supply chain partners. The top **10** accounted for **40.9%** of our subcontract spend. Approximately **92.1%** of our first-tier supply chain is located in the UK.

We recognise that our visibility is strongest at first tier and reduces at each subsequent tier. Extending visibility beyond tier one, particularly into labour supply, into sub-subcontracting, and into the materials our trade partners buy on our behalf, is a stated priority for the coming year and is reflected in the objectives at section 8.

3. OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

(Section 54(5)(b))

Our position is set out in a suite of policies that are owned by named individuals, reviewed at least annually and made available to all employees through the Employee Handbook and intranet. Relevant policies are cascaded to our supply chain through our Supplier Code of Conduct and through contract terms.

- **Modern Slavery and Human Trafficking Policy (BW-HR-POL-0021):** sets our zero-tolerance position and the standards we expect of everyone who works with us.
- **Supplier Code of Conduct:** requires suppliers to uphold the same zero tolerance approach, to cascade it to their own supply chain, and to evidence compliance on request. Acceptance is a condition of trading with BW.
- **Right to Work and Immigration Compliance Policy (BW-HR-POL-0027) and Illegal Workers Policy (BW-HR-POL-0056):** require right to work verification for every person engaged, without exception, including permanent, fixed term, agency supplied, contractor, consultant, apprentice and work experience personnel.
- **Recruitment and Selection Policy:** confirms that all work is entered into freely, that checks follow Home Office guidance, and that recruitment fees are never charged to workers.
- **Whistleblowing Policy:** enables employees, workers and supply chain personnel to raise concerns about exploitation in confidence and without fear of reprisal.
- **Grievance Policy:** provides a route for anyone to raise concerns and have them properly investigated.
- **Equality, Diversity and Inclusion Policy:** promotes a fair and inclusive workplace free from discrimination or mistreatment.
- **Anti-Bribery and Corruption Policy:** addresses conduct risks that frequently sit alongside labour exploitation.

We also require, and hold ourselves to, the following universal principles across our own operations and those of our supply chain: employment is chosen freely; freedom of association is respected; working conditions are safe and hygienic; child labour is not used; wages meet or exceed statutory minimums; working hours are not excessive; no discrimination is practised; regular employment is provided; and no harsh or inhumane treatment is permitted.

4. OUR DUE DILIGENCE PROCESSES

(Section 54(5)(c))

Our due diligence operates across the full lifecycle of a working relationship, before engagement, at the point of engagement, during delivery on site, and after any concern is identified. The following describes what we actually do, who owns it, and how often.

4.1 OUR OWN PRE-QUALIFICATION

BW is a Constructionline Gold member. Gold is the membership tier aligned to the Common Assessment Standard, the Build UK industry pre-qualification question set, and the assessment includes independent validation of our Modern Slavery Act adherence alongside our environmental, quality, equal opportunities and anti-bribery and corruption arrangements. Our compliance is therefore verified by a recognised third party assessment body and re-assessed annually, rather than resting on self declaration alone.

4.2 BEFORE ENGAGEMENT: SUPPLIER AND SUBCONTRACTOR ONBOARDING

No subcontractor or supplier is engaged until they have completed our pre-qualification process. This is administered by our Commercial and Procurement teams and captures company information, ownership, labour model, insurances, accreditations and compliance policies.

We use Constructionline downstream as part of that process. Where a prospective supply chain partner holds a current Constructionline registration, we review their assessed profile and take assurance from the validation already carried out. Constructionline registration is not, however, a prerequisite for working with BW. Many of the specialist trades and smaller businesses we rely on are not registered, and we do not regard the absence of a scheme membership as a proxy for poor labour standards, nor its presence as a substitute for our own judgement. Every prospective partner is therefore assessed against the same minimum requirements, whichever route the evidence comes through.

Our pre-qualification requires, of every supplier and subcontractor:

- Specific modern slavery responses: whether the organisation is a relevant commercial organisation under section 54; where its own statement is published; how it verifies right to work; whether it uses agency, self-employed or sub-subcontracted labour and to what depth; and whether recruitment fees are ever charged to workers.
- Verification of company standing and ownership through Companies House.
- Where the organisation supplies labour, confirmation of a valid Gangmasters and Labour Abuse Authority licence or equivalent registration where one is required.
- Acceptance of our Supplier Code of Conduct.

Suppliers who are unable to satisfy our minimum requirements are not onboarded. Where a gap is capable of being closed, we set a corrective action with a deadline and re-check before approval, because excluding a smaller business outright often moves risk elsewhere rather than reducing it. Approved suppliers are recorded on our approved supply chain register, with a named owner and a review date.

Based on our current onboarding records, approximately 62.0% of our first-tier supply chain partners are Constructionline registered.

4.3 AT THE POINT OF ENGAGEMENT: CONTRACTUAL CONTROLS

- Our standard subcontract and purchase order terms require compliance with the Modern Slavery Act 2015 and with our Supplier Code of Conduct.
- Those terms require the supplier to impose equivalent obligations on its own supply chain, so that the requirement flows down through every tier.
- They require the supplier to notify us promptly of any actual or suspected instance of modern slavery in connection with our work, and to co-operate fully with any investigation.

- They give us the right to audit, to request evidence of compliance, and to require remedial action.
- Material or persistent breach is a ground for suspension and, ultimately, termination.
- Worker paid recruitment fees are expressly prohibited under our terms, at every tier.

4.4 LABOUR AND RIGHT TO WORK VERIFICATION

- HR verifies right to work for every individual joining BW, before their first day. British nationals present original documents which are checked in person and securely recorded; other nationals provide a share code which is verified through the Home Office online service. No individual starts work without HR confirmation.
- Visa and permit expiry dates are tracked, and checks are repeated three to six months before expiry.
- We hold a Home Office Sponsorship Licence, managed through the SMS portal, and are supported on immigration matters by qualified immigration lawyers.
- We carry out background checks on the agencies that supply labour to us, including where an agency is operating in a supervisory role, and we require agencies to evidence their own right to work and pay practices.
- We require our subcontractors to operate equivalent right to work checks within their own supply chain, both as part of their selection process and again on induction onto site.
- We require that all personnel working on our projects, ours and our supply chain's, have written terms and conditions of employment or engagement in place before commencing work.

4.5 ON SITE: OPERATIONAL CHECKS

- Identity is checked at site induction and access is controlled, so that we know who is on our sites and who they work for.
- Modern slavery awareness forms part of site induction. The Modern Slavery Helpline (08000 121 700) is communicated at induction and is displayed on site through posters and welfare area signage, so that workers have a route to remedy that does not depend on their employer.
- Site management and supervisors are briefed on the indicators of exploitation, for example workers with no identification or with documents held by a third party, several workers sharing a bank account or an address, workers being transported to site as a group, poor English coupled with a third party always speaking for them, signs of poor living conditions, or reluctance to discuss pay.
- Where indicators are observed, the escalation route is to the Project Lead and HR immediately, and site management is instructed not to confront a suspected controller directly.
- We carry out risk triggered labour and welfare checks on our sites, informed by the BW AI supply chain assessment tool, including reviewing that operatives present are those recorded, and spot checks on pay and hours records within our supply chain.

4.6 ONGOING MONITORING AND AUDIT

- Supply chain compliance is re-reviewed at least annually for retained suppliers, and immediately where there is a change in ownership, labour model or performance concern.
- We carry out an annual internal audit of right to work records and of supply chain compliance documentation.
- We will complete the Cabinet Office/CCS Modern Slavery Assessment Tool (MSAT) following any framework award and annually thereafter, and we will act on the improvement areas it identifies.
- Findings are reported to the management board as part of the annual review of this statement.

4.7 IF SOMETHING IS FOUND - INVESTIGATION AND REMEDY

Our first priority in any suspected case is the safety and wellbeing of the individual concerned, not the commercial position.

- Concerns can be raised through line management, HR, our confidential whistleblowing channel, or the Modern Slavery Helpline. Anyone raising a concern in good faith is protected from reprisal.

- Suspected cases are escalated immediately to HR and to a nominated director, who will contact the Modern Slavery Helpline and, where there is a risk to life or of immediate harm, the police.
- We support access to remedy for affected workers — including continuity of pay where we are able to influence it, referral to specialist support, and co-operation with the National Referral Mechanism.
- We treat a supplier's willingness to remediate as the key test. Our default is to require corrective action and to work with the supplier to fix the underlying cause, because immediate termination can leave affected workers worse off. We will terminate where a supplier conceals an issue, refuses to remediate, or repeats a failure.
- Every case is logged, root-caused, and used to update our risk assessment, our pre-qualification questions and our training.

5. RISK ASSESSMENT AND MANAGEMENT

(Section 54(5)(d))

We assess modern slavery risk across our operations and supply chain at least annually, and on a project-specific basis where a project introduces unfamiliar labour or an unfamiliar supply route. Our assessment considers geography and labour practices, supplier structure and visibility, recruitment routes and the depth of subcontracting.

The areas of our business and supply chain where we assess the risk to be highest, and the steps we take in response, are as follows:

- **Multi-tier subcontract labour on site** - risk increases with each tier because visibility falls. Response: contractual flow-down of obligations, a requirement to notify us of sub-subcontracting, site access control and identity checks at induction, and labour spot checks.
- **Agency and self-employed labour** - workers are more transient and less likely to have written terms. Response: background checks on labour providers, GLAA licence checks where applicable, a written terms requirement before commencing work, and a prohibition on worker paid fees.
- **Lower skilled trades** - particularly demolition and strip out, general labouring, cleaning, security and waste. Response: targeted supervisor briefings, welfare checks and prioritisation of these packages for spot checks.
- **Materials and manufactured products bought by our trade partners** - risk sits at second tier and below, in manufacture and raw material extraction, and is often outside the UK and EU. Because we do not buy these goods directly, our response operates through our subcontract terms: trade partners must flow our standards down to their own suppliers, must notify us of the sourcing arrangements for higher-risk product categories on request, and must be able to evidence their own due diligence. We are progressively mapping the product categories where this risk is most concentrated.
- **Migrant workers with limited English** - greater dependence on a third party and lower likelihood of raising a concern. Response: helpline signage and induction materials in relevant languages, and briefing supervisors on the indicator of a third party always speaking on a worker's behalf.

Assessed risks and associated mitigations are recorded and monitored by the relevant business function. HR is responsible for modern slavery controls relating to our directly employed workforce and internal people processes.

Supply chain risks, including those relating to suppliers and subcontractors, are owned and managed by the designated Supply Chain Manager. Relevant risks and controls are reviewed through the appropriate governance and ISO management processes.

6. MEASURING OUR EFFECTIVENESS

(Section 54(5)(e))

We measure our effectiveness against the following performance indicators. Performance for the reporting period is shown alongside each.

- **Percentage of employees and workers with a completed right to work check before starting work** - target 100%; achieved **100%**.
- **Percentage of employees with current modern slavery training completion** - target 100%; achieved **75.5%**.

- **Percentage of first-tier suppliers and subcontractors who have accepted the Supplier Code of Conduct** - target 100%; achieved **100%**.
- **Percentage of first-tier suppliers who have completed modern slavery pre-qualification questions** - target 100%; achieved **86.4%**.
- **Percentage of first-tier suppliers holding a recognised third-party pre-qualification (Constructionline or other Common Assessment Standard body)** - **36.3%**.
- **Percentage of active sites where the Modern Slavery Helpline is displayed and covered at induction** - target 100%; achieved **78%**.
- **Number of labour or welfare spot checks carried out** - **1,448**.
- **Number of concerns raised through whistleblowing or other channels relating to labour exploitation, and number resolved** - **0 raised/0 resolved**.
- **Number of confirmed instances of modern slavery identified in our business or supply chain** - **0**.
- **Modern Slavery Assessment Tool (MSAT)** - not yet completed; no score or year on year movement is available.

Where a target is not met, the shortfall is reported to the management board with a corrective action and an owner.

7. TRAINING AND CAPACITY BUILDING

(Section 54(5)(f))

- All BW employees complete mandatory training on modern slavery and ethical working as part of induction, and refresher training thereafter.
- Our HR team holds CPD accredited Right to Work and Sponsorship training, ensuring we meet UK employment and immigration standards and can identify red flags of coercion or exploitation.
- Project leads, site managers and supervisors receive role-specific training on recognising the indicators of exploitation on site and on the escalation route to follow.
- Commercial and procurement colleagues receive training on modern slavery risk in supplier selection, on the pre-qualification questions and on what constitutes an acceptable supplier response.
- Modern slavery awareness is delivered to all site personnel, including supply chain operatives, at site induction, together with details of the Modern Slavery Helpline.
- We share guidance and expectations with our supply chain, and support smaller suppliers who need help meeting our standards rather than simply excluding them.

Training completion is tracked through **PeopleHR** and refresher training is delivered every three years.

8. OUR OBJECTIVES FOR THE YEAR AHEAD

We do not regard our current position as the finished article. Our priorities for the next reporting period are:

- Extend supply chain mapping beyond tier one for our highest-risk trade packages, and work with our trade partners to identify the product categories within their packages where sourcing risk is most concentrated.
- Complete the Modern Slavery Assessment Tool and act on the improvement areas identified.
- Increase the number and coverage of labour and welfare spot checks, and formalise the reporting of their findings.
- Strengthen data capture against the performance indicators at section 6, so that year-on-year trends can be reported.
- Refresh supplier facing guidance and run a targeted engagement session with our highest risk suppliers.

9. GOVERNANCE, APPROVAL AND REVIEW

This statement is reviewed and updated annually. It is approved by the management board, which is fully committed to its implementation, and is signed by a director on the board's behalf.

The People Director is responsible for internal workforce related modern slavery controls and co-ordinates consolidated reporting to the Board.

The designated Supply Chain Manager retains responsibility for supply chain modern slavery controls, risk assessment and reporting within their area of accountability.

This statement is published on the homepage of our website at wearebw.com and is registered on the UK Government Modern Slavery Statement Registry.

Modern slavery has no place here - not in how we build, hire, or work with others. We will keep this statement alive and relevant, checking in regularly to make sure it reflects our standards and the law.

Refresh supplier facing guidance and run a targeted engagement session with our highest risk suppliers.

 **Anthony Brown** | Chief Executive Officer