Modern Slavery Statement

2025

Balfour Beatty

Kinardochy Substation 400kV overhead line tie in project, Scotland

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Section 54 of the UK Modern Slavery Act states that all UK businesses with a global annual turnover of £36 million must report on the steps they are taking to tackle modern slavery.

This statement has been published in accordance with the Modern Slavery Act 2015 (the Act). It sets out the steps taken by Balfour Beatty plc. and other subsidiaries in the Balfour Beatty group of companies during 2024 to prevent modern slavery and human trafficking in its business and supply chains. This statement has been written using the Ethical Trading Initiative Framework for Evaluation[1] as a guide. It has been reviewed and approved by the Balfour Beatty plc. Board and signed on its behalf by Leo Quinn, the Balfour Beatty plc Group Chief Executive on 8 May 2025. It has also been approved by the boards of Balfour Beatty Group Limited and Balfour Beatty Group Employment Limited.

[1] https://www.ethicaltrade.org/issuesmodern-slavery/modern-slavery-statements-evaluation-framework

Front cover image: Tealing Substation, Dundee

Foreword

At Balfour Beatty, we are unwavering in our commitment to address the root causes of modern slavery, eliminate the conditions in which exploitation can thrive, and safeguard the rights and dignity of everyone working for and with us. Our approach continues to evolve each year, driven not only by the increasing expectations of government and our clients but by our own deep-rooted determination to lead by example. Central to this is our Code of Ethics, which reflects our commitment to treating everyone with dignity and respect.

As a leading contractor, we recognise that our responsibility extends beyond our own operations. The complexities of the construction industry mean that the risks associated with modern slavery are often most acute within the tiers of our supply chain. This is why we invest considerable effort in building and strengthening partnerships with our supply chain, helping them develop the capabilities to meet both legal and ethical standards. Over the past three years, our key focus has been on supporting our supply chain partners in maturing their practices, enhancing understanding, building resilience, and ensuring that meaningful, long-term improvements are made. Our aim is not merely to achieve compliance but to drive lasting change that eliminates exploitation and ensures that every worker is treated with the fairness and dignity they deserve.

There is no single solution to the challenge of modern slavery, which is why our approach is multi-faceted, addressing the many interconnected elements that sustain exploitation, as outlined later in this report. This includes ongoing review of our recruitment and employment practices to ensure alignment with national standards, embedding rigorous controls within our supply chain contracts, conducting targeted ethical labour audits, and implementing a risk-based approach to supplier audits – focusing on those whose goods and services present a higher risk of modern slavery or ethical sourcing concerns.

Our approach is one of continuous improvement, underpinned by both internal and external evaluations. These reviews provide us with critical insights that help guide the evolution of our practices, enabling us to identify areas for further development and ensure we are always moving forward. Looking ahead, we will renew our focus on operational delivery while continuing to strengthen our supply chain's capability in tackling modern slavery, building on the solid foundations we've already established.

This is not a challenge with a clear end point. The construction and infrastructure industry, with its fragmented structure and complex supply chains, remains one of the sectors most susceptible to exploitation. However, we know that lasting progress will only be achieved through collaboration – across our industry, with regulators, and with all those who share our commitment to protecting people and upholding their rights. Tackling exploitation in our sector demands continuous focus, ongoing improvement, and an unswerving commitment to vigilance. Together, we have both a responsibility and an opportunity to lead the way in creating a construction and infrastructure industry where exploitation has no place, and where every worker is treated with the fairness, dignity, and respect they deserve.

Leo Quinn
Group Chief Executive

Introduction

The UK construction sector employed 2.14 million people as of the fourth quarter of 2024[2]. According to Unseen's 2024[3] Helpline Annual Assessment, construction is the second most reported industry for cases of labour exploitation. The industry also saw a significant increase in the number of potential victims reporting that they worked in construction. The reasons for this are many and varied including an increase in the shortage of occupation visas and the dynamic nature of construction projects requiring workers to join and exit a project throughout its lifecycle, creating an environment where it is challenging to identify those workers who are most vulnerable. It is also likely that through collaboration from main contractors across the industry with partners such as the Supply Chain Sustainability School, Business Services Association and the wider supply chain, more awareness and training has enabled people to spot potential signs of modern slavery more easily and empowered them to speak up.

In recognition of the higher risk inherent in our sector, our approach to modern slavery is constantly evolving to ensure that we keep pace with the challenges of the changing external environment. In 2024, we continued to evolve our focus on our supply chain; supporting our supply chain partners to improve and mature their approach to modern slavery compliance, process and procedures.

In 2025 our modern slavery supply chain audit programme will enter its third year, embedding itself in our procurement approach to manage risk and deliver value. We will continue to enhance and embed our approach to improving the maturity of the controls, policies and processes within our supply chain whilst pivoting our focus to the operational delivery of our projects. This will enable us to understand the effectiveness and impact of our supply chain partners' approach to compliance and governance in relation to finding, preventing and remediating modern slavery risks. It will also provide us with greater visibility of the tiered supply chain that deliver our projects.

Key activities in 2024 included:

- Embedding human rights in our evolved sustainability framework, Building New Futures and communicating this to our operational team, employees and supply chain partners. See page 9.
- Partnering with an independent third-party expert to pilot a more focused approach to labour agency audits. See page 17.
- Completing a high-level assessment and gap analysis of our modern slavery programme against guidance BS 25700:2022, Organisational Responses to modern slavery. See page 10.
- Developing and launching guidance for supply chain partners including the practical and tangible actions they can take to improve their practices and sharing of a template to allow partners to create their own modern slavery statement - both available on our public facing website. See page 15.

[2] UK construction workforce 2024| Statista
[3] unseenuk.org/wp-content/uploads/2025/04/Unseen-Helpline-Annual-Assessment_2024.pdf

Our business and supply chain

About Balfour Beatty

Balfour Beatty is a leading international infrastructure group with 27,000 employees driving the delivery of powerful new solutions, shaping thinking, creating skylines and inspiring a new generation of talent to be the change-makers of tomorrow.

We finance, develop, build, maintain and operate the increasingly complex and critical infrastructure that supports national economies, and deliver projects at the heart of local communities.

Construction Services

> Our Construction Services specialises in the design and construction of major infrastructure and building projects in the UK, US and Hong Kong.

Support Services

> Our Support Services maintains, upgrades and manages vital services across the power transmission, distribution, utilities, road and rail sectors.

Infrastructure Investments

> Our Infrastructure Investments operates and maintains infrastructure projects and a portfolio of military and multifamily housing and student accommodation assets.

Our workforce

Balfour Beatty's workforce is made up of permanent and temporary roles across a breadth of skill levels, employed both directly by Balfour Beatty and via our supply chain partners. Due to the wide range of different contracts that those working with and for us are on, we apply appropriate employment practices and policies for each market and always work within the relevant collective agreements that are applicable to our projects and sites.

In the UK, our HR department follows a rigorous procedure for conducting right to work checks (see page 13). Additionally, once an employee is hired, the onboarding process involves signing the employment contract and receiving training on our Code of Ethics, which includes provisions relating to modern slavery.

We work with selected supply chain partners to ensure standards are upheld. An example of this is requiring all labour agencies to be able to satisfy us that employees all have written employment contracts, have not had to pay for the opportunity to work, and are legally able to work within the UK. Where umbrella businesses are used these services must be provided in line with the Freelancer & Contractor Services Association (FCSA) code of compliance.

Our supply chain

Balfour Beatty spends two thirds of its revenue in procuring goods and services from our external supply chain partners. Ensuring we are spending this money responsibly, is something we take very seriously.

Our supply chains are long and complex, and as a result we clearly communicate that we will only work with organisations that share our values and vision and that act in the same way with their onward supply chain. We have long-term relationships with the majority of our supply chain partners and take a proactive, risk-based approach to managing the risks of modern slavery in our supply chain, ensuring that it is a part of our supplier due diligence and on-boarding processes. We continually reinforce messages with supply chain partners about our expectations and standards.

UK

During 2024, Balfour Beatty contracted with over 7,100 supply chain partners in the UK. The supply chain represents a broad range of categories, typically segmented by Subcontract (51%), Services (25%), Goods (15%) and Plant (9%).

As for the prior year, around 50% of our UK supply chain spend fell within 8 spend categories considered to be at a potentially higher risk of either modern slavery or carbon intensity. For 2024 our assessment of these categories has been expanded and now identifies variances in spend per category to 2023.

As we continue to decarbonise our operations and supply chain to meet our carbon reduction targets, it is essential that we take a holistic view of sustainability, one that recognises the human rights risks linked to the transition to lower-carbon technologies. Materials central to decarbonisation, such as polysilicon in solar panels, are often sourced from regions with documented risks of forced labour and poor working conditions. Ensuring our climate action does not come at the expense of human rights is a critical part of building a truly responsible and sustainable business.

To enhance our understanding of sustainability risk more holistically, we have also now identified where these 8 categories are at high risk for modern slavery or highly carbon intensive.

US

During 2024, we contracted with over [10,800] supply chain partners across the US. We are committed to upholding the highest standards of ethical behaviour in our US supply chain, where we have long-term relationships with many of our supply chain partners which range from large global corporations to small, independent proprietorships.

As per the Global Slavery Index, the US is considered one of the countries with the lowest risk of modern slavery incidents. Our US business benefits directly from the Trade Facilitation and Trade Enforcement Act, passed in 2016 (TFTEA). TFTEA makes it illegal to import anything into the US that is created by forced labour or child labour.

The structure of our US business is varied, and so we adapt our approach to combatting modern slavery accordingly.

Spend Category	% of overall spend	Variance to 2023	Modern Slavery / Ethical Sourcing risk	Energy & Carbon risk
Design services	8.5%	↓	Low	Medium
Groundworks	9.4%	→	High	Medium
Piling	5.2%	↓	Medium	High
Labour	9.0%	↑	High	Low
Concrete	7.8%	↑	High	High
Aggregate and fill	2.5%	↓	High	High
Electrical	4.1%	↑	High	Medium
Survey and testing	2.9%	→	Medium	Medium

Modern slavery and human trafficking policies

Wherever we work in the world, we have policies and practices in place to mitigate the risk of exploitation in both our operations and in our supply chain. We work to uphold the rights of all those who work for or with us and of the communities in which we operate.

Balfour Beatty adheres to a comprehensive suite of policies and standards which are signed off by our Group Chief Executive or their nominated delegate and reviewed annually. These policies and standards require compliance with law and regulation. During 2024, efforts have been focused to ensure clear alignment of key policies referencing human rights and modern slavery. Together these policies confirm Balfour Beatty's commitment, reflect the UN Guiding Principles on Business and Human Rights and require compliance with internationally recognised requirements for workers' welfare and conditions of employment. Relevant policies and standards are built into our procurement processes and subcontracts, which require that our supply chain partners agree to commit and comply with them.

The key policies are summarised as follows:

Code of Ethics

Balfour Beatty recognises that an ethical culture is a fundamental requirement for a successful, sustainable business. Our ethics and compliance programme consists of a framework of enterprise-wide and strategic business unit-specific policies, procedures, guidelines and responsibilities. Our principles-led Code of Ethics remains the foundation of everything we do: providing a clear direction on the standards, values and expectations that guide the behaviours of our employees and supply chain partners.

The Code of Ethics sets out clearly our rejection of any form of child labour or slavery, including forced labour and our commitment to ensure that slavery and child labour are not taking place in our business or supply chain. Recognising the construction sector is particularly at risk, the Code sets out how to spot the signs of modern slavery in a clear and accessible way. It also signposts that if individuals see or suspect signs of modern slavery, they should contact Balfour Beatty's Speak Up helpline rather than speak directly to the individuals concerned.

We want to do business with partners whose standards are consistent with our own, and who respect our values. We therefore expect all our supply chain partners to adopt clear commitments to ethical business, consistent with those in our Code of Ethics, and to always act with integrity. Contracts with supply chain partners include a contractual commitment to comply with the Code of Ethics.

Speak Up policy

Speaking up is at the heart of our ethics and compliance programme and we continue to explore all opportunities for empowering employees to voice their concerns or questions. During 2024, a new group-wide Speak Up helpline was launched to enhance our ethics and compliance systems. The group-wide platform is supported with an independently managed Speak Up helpline, which our supply chain partners as well as members of the public are encouraged to use.

Our Speak Up policy makes clear that we will support anyone in doing the right thing and that we do not tolerate retaliation against individuals who report a problem or assist an investigation. The policy is widely publicised across all our offices and project sites and applies to employees, consultants, contractors and agency workers.

Recruitment policy

We conduct checks on all prospective employees to verify that they are eligible to work in the UK, acknowledging always that the recruitment of migrants and/or temporary labour is a human rights risk. We do not operate any policy that specifically targets the recruitment of migrants. We comply with the UK's stringent legal obligations in respect of hiring workers who do not have the right to work in the UK.

Core Valley Lines Transformation project, Wales

Procurement strategy

Our 3-year procurement strategy sets out our procurement priorities and how we will do business with our valued supply chain partners. It is a practical document that makes clear what we expect of those who we work with, and what we hold ourselves accountable to. The strategy sets out our commitment to work with our supply chain partners, and that we expect the highest standards and vigilance from them and their onward supply chain, in relation to effective management of modern slavery risks on our projects.

Building New Futures

In 2024 we evolved our Building New Futures sustainability strategy to include a supply chain integrity pillar to empower sustainable suppliers and champion ethical practices.

Working in partnership to safeguard ethical labour practices and protect human rights is one of the three focus areas within the supply chain Integrity pillar. This enhancement in approach recognises the importance that modern slavery and human rights play within the wider sustainability agenda. Also, that sustainability risks and opportunities are considered holistically across human rights, environment and socio-economic considerations and our path to net-zero is part of a just transition and not at the expense of people.

Sustainable Procurement policy

Our Sustainable Procurement Policy outlines how we embed sustainability in our procurement practices, sets out our priorities and, supply chain expectations. This includes identifying and minimising the risk of modern slavery in our business, our direct supply chain and the wider supply chain, ensuring our standards are met through multiple tiers.

Risk assessment and management

Risk exposure is ever evolving, and our business and supply chain assessments adapt accordingly. We gather intelligence about emerging risks through our industry collaborations and target our efforts where they can make the most impact.

Governance

At Balfour Beatty, we recognise that good governance is essential to ensure modern slavery is effectively addressed. Our Group Chief Executive and the Board of Balfour Beatty plc have ultimate responsibility for our response to modern slavery, with our modern slavery steering group providing strategic focus and oversight. The role of the steering group is to review and agree focus and the key activities to be delivered by the working group, ensuring alignment with wider business objectives.

To further combat the risk of modern slavery in our supply chain and on our projects, the modern slavery working group was restructured during 2024 to ensure a dedicated cross-functional team focused on modern slavery and labour standards. The objective of the working group is to bring together the right expertise with clear responsibilities, accountability, focus and deliverables, which are detailed in the table on the right.

In 2025, an additional workstream will be introduced to the working group to cover operational delivery and reviewing compliance and modern slavery incidents. The inclusion of this new workstream will allow us to improve our approach to the management of modern slavery risk and is in alignment with the BS 27500 guidance.

Workstream	Purpose	Key deliverables / outputs
Communications & training	To effectively communicate with employees and external stakeholders, appropriate messages as required	Modern Slavery Statement Contributions to third party guidance Training collateral Internal and external communications
BS 25700 gap analysis	To identify opportunities for improvement including enhancing internal procedures	Continual improvement and greater alignment with the guidance standard
Procurement & supply chain	Continual review and improvement of supply chain audit programme	Improved maturity of supply chain in relation to modern slavery and flow down to their own supply chain

Biannual updates on modern slavery are provided to the Audit & Risk Committee of the Board, as part of the Ethics & Compliance report.

Risk Management

The Board has established procedures to manage risk and oversee the internal control framework. A full assessment of emerging and principal risks is undertaken biannually to consider the effectiveness of the risk management and internal control systems including financial, operational and compliance processes and controls that are in place to prevent occurrence or limit the impact of risks. All risks, including those relating to modern slavery are tracked and managed using the Group risk register, which is part of the Group's bespoke risk management software package.

BS 25700:2022 Organisational Responses to Modern Slavery - Gap Analysis

Utilising our internal operational audit expertise to provide impartiality, we conducted a high-level assessment of our approach to modern slavery against the BS 25700 guidance. This was to provide a deeper understanding of the opportunities for improvement and any gaps that exist in our current approach.

Key findings included:

- **Single point of truth**
  The responsibility for our approach to combat modern slavery is co-owned by multiple functions and therefore there is useful information in multiple places. Through 2025 we will work to develop a single point of information.
- **Need for group policy**
  Although we publish an annual modern slavery statement and have numerous policies that include elements related to modern slavery and ethical sourcing, we do not have a group policy that brings it all together. This will be introduced in 2025.
- **Clear roles and responsibilities**
  Document the functions, roles and accountabilities in a responsibility matrix and ensure this is reflected in job descriptions and objectives.

In addition to the actions identified from the gap analysis conducted in 2024, during 2025 we will evolve this to develop a maturity assessment. This will enable us to formalise our starting position and measure our improvement as we mature our approach, ensuring close alignment with BS 25700.

Supply chain transparency

Based on thorough evaluation, research, and insights gained from our extensive experience in the construction industry, we have determined that the most significant risk of modern slavery lies within the tiers of our supply chain. This risk is linked to the nature of the sector, which is characterised by a high number of temporary workers, as well as the use of contractors and subcontractors.

To better understand the scale of risk and what measures we can take to 'find it, fix it, and prevent it' we worked with Constructionline through 2024 to develop and trial a supply chain transparency tool that enables greater visibility of the long, complex supply chains found in the sector. Being able to overlay this information with a number of risk tools available including, Walk Free's Global Slavery Index will provide supply chain insights that have not been available before.

Through 2025 we will continue to map the extent of our supply whilst developing and improving the tool in collaboration with Constructionline ready for implementation.

Case study: Modern slavery: reframing the narrative

At Balfour Beatty we recognise that modern slavery is not just a legal risk or a compliance issue, it is a human one. Behind the term 'modern slavery' are real people who have been exploited and stripped of their dignity and human rights, the term itself seems too far removed from these people and can create barriers to understanding, and action.

In the UK, 'modern slavery' is often associated with policies, audits, and statements, and therefore familiar to legal and corporate compliance teams, but can quickly become daunting and unwieldly to many employees. In our US operations, the term isn't well known or understood, instead they use terminology like forced labour, human trafficking and exploitation in its place.

The Chartered Institute of Building produced an image, the exploitation spectrum (see below) that clearly illustrates there is a 'scale of badness'. While a number of matters on the spectrum are not things directly associated with modern slavery, they are often indicators or signs that someone is not being treated fairly and may be being exploited.

As we pivot our approach to our operational workforce which includes both our direct employees, and indirect workforce through the supply chain, it is imperative that we change the language to make this topic real, accessible and actionable for everyone. Use of the updated terminology on "worker exploitation" has been successfully trialled in our 2024 modern slavery poster campaign (see page 22).

Through 2025 we will roll out the refreshed "worker exploitation" terminology more widely across the business as well as using the exploitation spectrum to raise awareness and understanding of this issue. We will also be aligning our approach where appropriate with the topic of "wellbeing" (part of Balfour Beatty's health & safety strategy), to ensure everyone goes home safely and well at the end of the day.

Due diligence processes

Our due diligence processes help us to monitor the effectiveness of, and compliance with, our policy commitments, as well as to identify, assess and respond to modern slavery risks, impact and abuses.

Our strategic approach to tackling modern slavery

Our strategic approach to identifying, preventing and mitigating the risk of modern slavery within our business is based on making it difficult for modern slavery to thrive. Equipping people to identify modern slavery and to know what to do if they suspect it, whilst making it clear that we will not work with supply chain partners or source materials from those who do not take it seriously and aim to root it out.

There is no single solution to tackling modern slavery, which is why our approach is multi-faceted and aims to address all of the different, interlinked elements as illustrated by the diagram below.

Pre-qualification process
Supply chain audit
Labour agency audits
Ethical labour audits
Supplier sustainability conditions
Promotion of supply chain
Supply Chain Sustainability School modern slavery training modules
Supplier sustainability conditions
Procurement integration (Jaggaer)

Cultural Framework
Code of Ethics
Speak Up helpline
Building New Futures
Modern Slavery Statement

Assurance and internal audit
Code of Ethics training
Key performance indicators
Modern slavery training and toolbox task
Rights to work checks
Risk register

Business Services Association Modern Slavery Council
Built Environment Against Slavery Group
Modern Slavery Strategic Partnership
Supply Chain Sustainability School

Overhead lines training centre, Raynesway, Derby

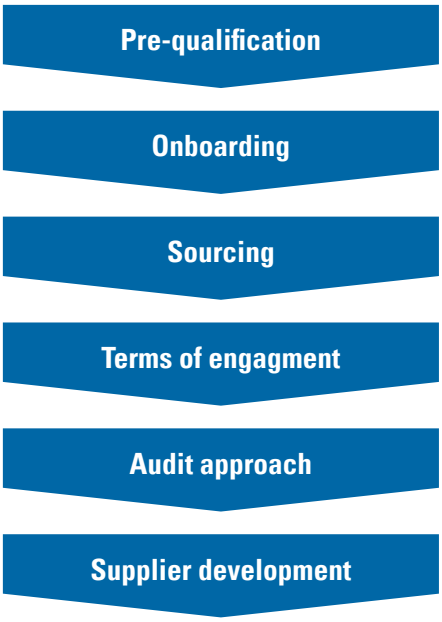
HR UK processes

As part of our onboarding process for new employees, we check the bank details supplied by employees to ensure they will be receiving the money directly into their bank account, this can include a joint bank account. We carry out passport verification checks to ensure that employees have not been forced to use false or forged identity documents and use a digital checking provider (IDSP) to check all right to work documents as part of our onboarding process for all new starters. Additionally, once an employee is hired, the onboarding process involves signing an employment contract and receiving training on our Code of Ethics, which includes provisions relating to modern slavery.

We seek to ensure our recruitment and employment practices are constantly reviewed and aligned with national standards and best practice by working with employers, trade associations and trade unions. These relationships are managed via a combination of continuous informal communication and regular structured meetings; this enables issues to be identified and resolved at the earliest opportunity by working collaboratively to achieve the best outcomes. We also align to 11 national agreements.

UK supply chain partners are required to undertake robust checks on all worker documentation to ensure its authenticity, validity and that the worker presenting matches their documentation. We also expect that all workers should have a written contract of employment and be able to confirm that they have not had to pay any direct or indirect fees to obtain work. They should be paid at least the legal minimum wage and not have wages deducted for accommodation, food or to repay any supposed debt. Workers should be informed of their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

Supply Chain due diligence for modern slavery (UK)



Pre-qualification

We are partnered with Constructionline, a recognised assessment body, to manage the pre-qualification process of our supply chain against the Build UK Common Assessment Standard (CAS). As part of the standard onboarding process, supply chain partners are required to complete the CAS questions on Corporate & Professional Standing, which includes dedicated questions on whistleblowing, anti-slavery and human trafficking, and minimum standard working conditions. Suppliers with a turnover over £36 million are also required to provide their modern slavery statement. This is verified by Constructionline as part of the CAS.

Onboarding

During 2024, we continued to develop and improve our supply chain due diligence process and delivered on our 2022 commitment to raise the bar and require all supply chain partners, irrespective of turnover, to provide a modern slavery statement or similar where they are pre-qualified through Constructionline.

We also enhanced our assurance activities in relation to this commitment by introducing monthly sample audits of the modern slavery statements provided by supply chain partners with a turnover of less than £36 million.

Sourcing

The foundation of our approach to sustainable procurement is our Supply Chain Sustainability Risk heat map which integrates material sustainability considerations into procurement systems and processes, influencing what we buy and how we buy.

The heat map identifies two key risk criteria which are:

> Ethical sourcing, defined as categories where there is a high risk for ethical issues within the supply chain including traceability, bribery and corruption, and human rights; and

> Modern slavery UK, defined as subcontract categories where there is a risk of labour exploitation occurring on our projects.

Where a supplier or subcontract package is identified as being at a higher risk of ethical sourcing or modern slavery on the heatmap, our Procurement team can select a tailored question set for their tenders. This ensures we take a risk-based approach and focus attention on the highest risk areas without over-burdening all of our supply chain partners with additional tender questions.

Terms of engagement

Our approach to managing relationships with our supply chain partners involves taking into account the contract structure, which reflects the risk of modern slavery and labour exploitation. Several measures are taken to address modern slavery within our supply chain contracts, including incorporation of applicable contract terms that require our direct supply chain partners to incorporate modern slavery standards in their own supply chains. Additionally, we utilise contractual audit clauses to facilitate supply chain audits to provide reassurance that modern slavery is being effectively addressed and managed by our supply chain partners.

In addition, our Supplier Sustainability Conditions, available on our website, set out the minimum standards for our supply chain in relation to sustainability on our projects. This covers a broad range of areas including: how to raise concerns and Speak Up; ethical sourcing; labour standards; regular labour audits for supply chains in countries of high-risk of modern slavery; and specific requirements for Xinjiang province in China as well as natural stone and solar PV.

Audit approach

Throughout 2024, Balfour Beatty continued to focus on upskilling our UK supply chain and improving approaches to modern slavery across the industry. Following a pilot of modern slavery supplier audits in 2023, we held an improvement workshop to collate feedback from our supply chain partners, collaborating to enhance the process. As a result two key changes were identified that we then incorporated into the supply chain audit process:

1. Developing a two-stage audit

> Phase 1 consists of a self-assessment by the supplier in advance, enabling them to work through the questions, prepare their evidence and build a picture of their own maturity.

> Phase 2 involves an in-person audit to discuss the self-assessment, review the evidence and discuss maturity against each audit section resulting in an agreed set of improvement actions. This two-stage process enables more meaningful and impactful conversations.

2. Greater visibility of potential actions and support resources

> We developed a supply chain audit guidance document which set out key improvement actions that could be taken by our partners following the audit, and signpost to free, external resources including guides and templates to provide further support.

> We enhanced the potential actions that are available for selection by the procurement team within the audit portal during the audit, as well as creating space for the team to input supplier specific actions.

During 2024 we continued to use the risk-based approach developed previously to identify suppliers to audit, focusing on those supply chain partners providing goods and services with high-risk of modern slavery and/or ethical sourcing.

In 2025 we will re-audit a targeted selection of supply chain partners that were audited in 2023. This will allow us to assess their improvement and the impact of our collaborative audit style in improving the maturity of our supply chain on modern slavery.

For our 2024 key performance indicators (see page 20) we targeted completing 150 supply chain audits during 2024. Over the course of the year 187 were completed. Since starting the audit process in 2023, 308 supply chain partners have been audited, accounting for a third of our UK supply chain spend.

Supplier development

After each audit, the resulting report, which included the supplier improvement actions discussed and agreed during the audit, was shared with the relevant supply chain partner. Responsibility for delivering the agreed actions rests with the supply chain partner, supported by a range of free resources signposted within the report and our supply chain guidance document.

To ensure that identified issues were effectively addressed and improvements achieved, we introduced additional support measures. We hosted two supply chain workshops, delivered by the Supply Chain Sustainability School, and invited audited supply chain partners to participate. These workshops were designed to help suppliers tackle the key issues raised during the audit programme and to strengthen their approach to managing modern slavery risks within their own operations and broader supply chains.

Additionally, 12 supply chain partners were identified as needing further one-to-one support to accelerate their progress. Thanks to the collaborative nature of the audit process, these partners engaged positively, and significant improvements were observed among those receiving targeted support.

In 2025, we plan to explore a more consistent approach to building supply chain capability on modern slavery. We will leverage the data-driven insights from our audits and the expertise across our teams to deliver the right balance of support and upskilling opportunities.

Hinkley Point C, Bristol

Case study: Our approach to supply chain audits

Focus:

Our audit approach focuses on the following topics which form the sections which we ask our supply chain partners to consider as part of our supply chain audit:

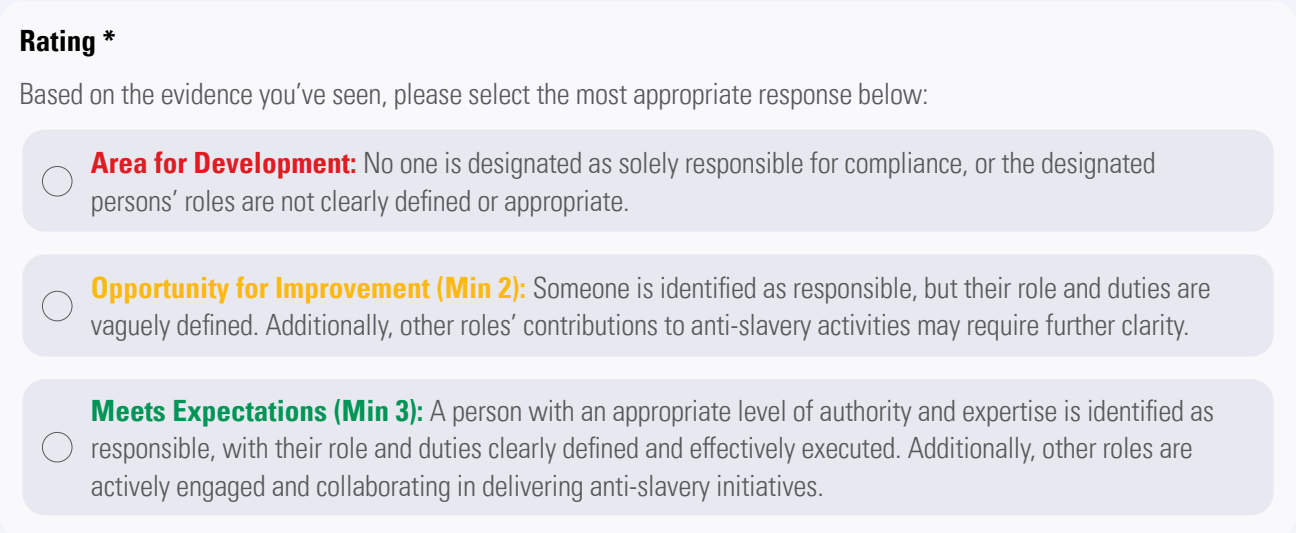
> Modern slavery statement
> Responsibility for modern slavery
> Modern slavery risk
> Supply chain due diligence
> Employee engagement
> Whistleblowing mechanism
> Fair wage & employment verification
> Minimum wage

Methodology:

Within the audit for each section (above) is a question pertaining to how that topic is managed and a list of potential evidence that could be used to demonstrate the supply chain partner's approach. The types and number of evidence available are used to assess the maturity of our partner's approach where they can receive one of three ratings:

> Meets Expectations
> Opportunity for Improvement
> Area for Development

For each section the audit form sets out clearly what evidence must be provided for each rating. The image below shows the rating options for the 'Responsibility for Modern Slavery' section:



Where Area for Development or Opportunity for Improvement are selected, a list of potential actions are displayed that can be discussed with the supply chain partner to agree the most appropriate one(s) that will become the partner's action plan. There is also an opportunity to create a bespoke action for the supply chain partner.

Case study: External audits of blue-collar labour agencies

Recognising that the risk of worker exploitation and modern slavery is high in our labour agency supply chains and following general feedback from the worker interviews carried out across the industry by Achilles, in 2024, we partnered with external labour assurance expert, Nutral Solutions Ltd to undertake a more forensic review of our blue-collar agency supply chain.

The review was intended to go further than our own audit programme, to conduct a focused operating model review, ensuring we had optimal ways of working across three areas: risk management, process, and commercial. Following a data gathering exercise, this programme was piloted with five suppliers to provide an enhanced level of assessment. The approach included visiting the supplier offices and conducting checks including, but not limited to:

> Ensuring appropriate use, and timely issue, of worker documentation (key information documents and employment/ engagement contracts);

> Sample checks of worker payslips; and

> Management systems assessment to ensure compliant practice.

A number of opportunities for improvement were found including:

> Issuing of key information documents to workers;

> Understanding and mapping of sub-tier suppliers (such as umbrella companies); and

> Enhanced due diligence processes when our suppliers are selecting sub-tier suppliers.

Nutral Solutions Ltd and Balfour Beatty are working alongside the supply chain partners on the improvement opportunities identified to further enhance performance. We are also taking positive action, where the need has been identified during the audit, to work with the relevant labour agencies to enhance their wider compliance processes.

Following the pilot in 2024, and given the breadth of opportunities for improvement identified, we intend to expand this audit programme through 2025 to a wider group of our blue-collar labour agencies through 2025 both as a supplier development tool, and to ensure compliance by our supply chain partners is fit for purpose. Recognising the complexity of labour agency arrangements, going forward we will also ensure that future audits are carried out by independent third-party experts.

M25 J10 Wisley bridge

Balfour Beatty
MOTOROLA

Ethical labour audits

In addition to our internal audit programme, we engaged an independent auditor with sector experience and expertise to roll out an externally facilitated ethical labour audit across three project sites. These ethical labour audits conducted worker engagement surveys to understand and assess the labour practices of workers engaged on site, including workers from lower tiers of our supply chain. The workers were interviewed on site (reducing their downtime) in areas of safety where they could not be overheard.

The ethical labour audits help us assess whether the findings from supplier audits, which focused on compliance, systems, and processes reflect the actual experiences of workers on our projects. These audits provide valuable insights into how effectively modern slavery risks are communicated and managed within our supply chain, and how our on-site practices can influence and improve these outcomes. Through this process, we've identified common themes that are now guiding the development of enhanced training and support for both our employees and supply chain partners.

Modern slavery concerns raised in 2024

We take all allegations of unethical behaviour and potential incidents of modern slavery extremely seriously and our Speak Up helpline is available to employees and third parties to allow confidential reporting of concerns. Details of the Speak Up helpline are widely publicised across our sites and offices, including via multi-lingual posters designed to raise awareness of the signs of modern slavery, to signpost to workers how to access help and further support.

No reports concerning modern slavery were made to the helpline in 2024. However, we did notice a rise in the number of general Speak Up reports across the Group, with an 11% increase from 2023. This is a positive trend attributed to the steady state of continued willingness to speak up. Reports received from external parties amounted to 26%, indicating that our supply chain partners are becoming increasingly comfortable with raising concerns via our Speak Up helpline.

While no Speak Up reports relating to modern slavery were received, the supply chain audits conducted during 2024 identified some key themes which will be incorporated into our supplier development approach as part of the future plan.

Remediation

In recognition of the importance of effective remediation for modern slavery and labour exploitation in the construction sector, we purposefully set two key performance indicators for 2024 to track and ensure a meaningful response to supply chain audits completed. Both targets were achieved during 2024. Please see page 21 for further details of the development workshops run and supported action plans provided to our audited supply chain partners.

In previous years we have also targeted working with an independent co-operative to fast-track survivors of modern slavery into employment as part of our commitment to supporting effective remediation. Due to the practicalities of business requirements and the fast-moving and time critical nature of our projects, we were again unable to identify and ringfence an open role for our partner to wait for a survivor to fill.

Going forward we will look to explore other ways in which we can support and respond to individuals that have been harmed, and mitigate future potential of harm.

Key performance indicators and measuring effectiveness

Last year we updated our key performance indicators (KPIs) for alignment with the CCLA's leading Find It, Fix It, Prevent It initiative framework[6]. Our objective in doing so was to ensure the KPIs effectively measured the steps taken across Balfour Beatty to minimise modern slavery risk.

During 2024 we achieved the targets for all the KPIs set. Whilst this was the result of significant effort by the responsible teams across the business, we are mindful of the need to ensure continuous improvement in our programme. Also, that our KPIs are set in such a way that they appropriately challenge us to do better and ensure measurable progress. For this reason, during 2025 we will assess and where appropriate realign our KPIs to ensure they target qualitative, not just quantitative improvements. An example of this approach that we are committing to next year relates to the Find It indicator, where we will move away from an absolute number of supply chain audits to complete. In place we propose a qualitative measure to target completing audits on a 10% threshold of our high-risk supply chain partners on a three-year rolling period. High-risk to be defined by our heat map outlined on page 14 above. This approach will ensure we target audits where they will be of most value.

We also wish to challenge ourselves further on the Fix It indicator, specifically in relation to the supply chain partners for which a supported action plan is provided. During the next year we will further consider the findings of the 2024 and 2025 audits to determine the appropriate threshold for putting forward a supply chain partner for a supported action plan by reference to a consistent benchmark or threshold that will take account of the number and severity of audit findings.

KPI	Indicator	2023 achievement	2024 target	2024 achievement	2025 targets[7]
Find it					
Conduct supply chain audits	Number of audits completed Rolling 3-year audit target for 10% of supply chain partners classed as high risk for modern slavery	121	150	187	10% of high-risk supply chain partners subject to supply chain audit
Fix it					
Meaningful response to supply chain audits	Number of: Development workshops	N/A – new for 2024	2	2	2
	Number of: Supported Action plans	N/A – new for 2024	12	12	N/A – see above for revised approach.
Prevent it					
UK supply chain partners with a modern slavery statement or equivalent, regardless of turnover where prequalified via Constructionline	% of UK supply chain partners with statement pre-qualified on Constructionline	84%	95%	100%	98%

[6] Find It, Fix It, Prevent It (FFP) is an investor collaboration created, convened and resourced by CCLA, the UK's largest charity fund manager. It was formally launched at the London Stock Exchange in 2019 and is overseen by an advisory committee that brings together investors, academics and NGOs to share knowledge, set targets and monitor progress.
[7] Reflects targets reported on in the 2025 Annual Report, as verified by KPMG.

Training and capacity building

Training

Our colleagues and our supply chain partners play a major role in helping us to identify and prevent modern slavery in our supply chain. There are parts of our business where an in-depth knowledge of modern slavery issues is required.

During 2024, our Executive Committee participated in the delivery of an awareness session focused on modern slavery risks. We continued to take a risk-based approach to deployment of enhanced training and over the course of the year a number of targeted training courses to different job families identified as having a training need. This included: refreshed modern slavery awareness and audit training to our Procurement teams to support the revised audit approach; modern slavery awareness training to the environmental teams, and an updated toolbox talk for discussion and roll out with our project-based teams to mark anti-slavery week.

Our Introduction to the Code of Ethics training includes a section dedicated to modern slavery to increase awareness among our employees. By delivering this training to all employees with a Balfour Beatty email address, we aim to ensure that our employees are equipped with the knowledge and understanding necessary to prevent and combat modern slavery in all its forms. A dedicated training session was also provided to Balfour Beatty's UK Ethics Officers as part of the agenda for the Ethics Officer 2024 training day.

In addition to the dedicated workshops run to support the maturity development of our supply chain partners following their compliance audits (see page 15), we also successfully launched guidance for supply chain partners including the practical and tangible actions they can take to improve their practices, sharing of a template to allow partners to create their own modern slavery statement and signposting to free, external resources provided by organisations like the Supply Chain Sustainability School, Business Services Association and UK Government.

Going forward into 2025, we will continue our approach to providing targeted training to those job families or functions identified with specific training needs. This is currently intended to be via an interactive, scenario-based training module to support these employees in identifying risks, whilst ensuring it is appropriately tailored to their training requirements.

Badenoch and Strathspey community hospital in Aviemore, Scotland

Communication

We are continuing with our efforts to evolve our sites and other workplaces to ensure modern slavery cannot survive. This includes how we make sure that those who work for us and with us are aware of the issues and what to do about it, and how we highlight to those who may be victims of modern slavery ways to access assistance.

For employees with a Balfour Beatty email, our policies, guidance, and training tools are available on our internal intranet. For those that do not have a Balfour Beatty email address, and for our employees and supply chain / subcontracted workers based on sites, we continue to disseminate information and raise awareness of modern slavery and how to identify and report the signs of modern slavery.

Our modern slavery poster collateral was refreshed in October 2024 (see above) to run a pilot using the new terminology referred to in the case study on see page 11. The posters included clear details of the physical signs of worker exploitation, workers' rights under UK law and how to report concerns of exploitation. The posters were issued across the UK business to project sites to reinforce our commitment to preventing modern slavery and worker exploitation, sending a clear message that this will not be tolerated within any of our operations. The posters were displayed both in communal areas within our site offices and in places where workers may have a private moment, including on the back of toilet cubicle doors.

During 2024 we built on this sentiment by continuing our work on supply chain audits, enhancing awareness of modern slavery throughout our supply chain including sharing with all supply chain partners a summary of the key points arising from our 2024 modern slavery statement. We also supported our partners with the production of their own modern slavery statements where requested and targeted efforts to equip our supply chain partners with the tools necessary identify and report instances of exploitation.

Collaborative action

Working collaboratively to increase our understanding and maximise the impact of our actions to tackle modern slavery remains a cornerstone of our approach. We continue to build on our existing collaborative work and partnering with key stakeholders in mitigating modern slavery risks.

CCLA Roundtable (April)

In April, we attended and contributed to the construction sector roundtable with investors, regulators and the Cabinet Office to discuss the systemic risk of modern slavery and labour exploitation in the sector. Key takeaways from this day have been fed back into our programme including the critical role of collaborating across industry to combat exploitation, to work together to share findings of concern and address systemic issues and the need to adopt language and terminology that works at a site-level.

Modern Slavery Intelligence Network (MSIN)

Following an initial exploratory meeting which Balfour Beatty attended with Stop the Traffik, CCLA and the Supply Chain Sustainability School, we played a critical role through 2024, bringing together main contractors, supply chain partners and third-party organisations to explore opportunities to replicate the MSIN that exists in the grocery sector.

MSIN provides a way of sharing data intelligence related to modern slavery across the industry. The built environment sector is not mature enough at this moment in time to be able to feed insights into the too However in the medium-long term this is an opportunity to utilise data to manage risk, identify potential instances of modern slavery and critically, stop it in its tracks before it has the opportunity to move onto another construction project.

Business Services Association (BSA)

The forum facilitates communication among service providers to address common interests and improve services in both the private and public sectors. In 2024 we contributed to the frontline workers – modern slavery pack by providing context and templates in relation to holding wellbeing conversations. This pack was launched in December 2024.

CPA Handbook

In October 2024 we contributed to a document for parliaments of the commonwealth, providing a view of modern slavery from both the construction sector as well as a strategic supplier to UK Government. The handbook is due to launch in 2025.

Supply Chain Sustainability School

Balfour Beatty continues to recognise the benefits provided by the Supply Chain Sustainability School which provides free of charge resources and training for the construction supply chain with the aim of upskilling and spreading best practice across the industry. As a funding partner of the Supply Chain Sustainability School, we provide support and expertise to many of its working groups, including the Built Environment Against Slavery group (BEAS) which we co-chair.

Built Environment Against Slavery Group (and conference)

In October we presented at the BEAS conference, sharing our collaborative audit style, the benefits we've realised as well as those our supply chain partners have experienced.

Early Careers graduates, Derby

Edinburgh Futures Institute, Scotland

Looking ahead – 2025 actions to mitigate modern slavery

Governance & strategy (aligned with BS 25700)

Formerly, 'BS 25700 gap analysis', actions will now focus on the enhancement of governance and strategy, including related activities identified in the gap analysis.

> Developing a group policy statement setting out our strategy, objectives and policies, aligned with BS 25700 guidance.

> Establishing a baseline for our maturity against BS 25700 to enable measurement of improvement.

> Documenting the functions, roles and accountabilities relating to modern slavery governance in a responsibility matrix and ensuring this is reflected in job descriptions and objectives.

> Considering sustainability risk more holistically, we will run a workshop with key stakeholders to review the findings from the Double Materiality assessment (due to complete in 2025) to identify any gaps in our sustainability framework in relation to human rights. In addition, risks and opportunities identified through the process will be reviewed to ensure where appropriate, they are on the risk register with controls and/or mitigating actions in place.

> Exploring alternative approaches to support remediation of those who have been exploited.

Data driven insights

This is a new workstream focused on utilising digital tools and data to provide insights enabling greater and more targeted action.

> Establishing new workstream for data driven insights to focus on reviewing compliance and modern slavery incidents and operational delivery.

> Collating, overlaying and reviewing data available through our Speak Up helpline, ethical labour audits, supply chain audits, labour agency audits and other relevant sources to provide data-driven business insights (this is likely to continue through 2026).

Communications & Training

> Embedding refreshed "worker exploitation" terminology and use of the exploitation spectrum to improve awareness and understanding across the business, aligning where appropriate with the wider topic of "wellbeing".

> Communicating relevant case studies and data driven insights through internal communications channels including to the health & safety community, wellbeing and mental health first aider community, ethics officer network and wider business.

> Developing and deploying an interactive, scenario-based training module to support employees in identifying risks, ensuring the training is tailored to different roles and responsibilities.

> Providing briefings and enhanced training to spot the signs of modern slavery to our site supervisor network, sustainability team and our health, safety and wellbeing function (including to our mental health first aiders) reinforcing the connection between mental health & wellbeing and exploitation.

> Developing a single point of information bringing together our internal resources to combat modern slavery.

> Delivering a workshop on a live project utilising lived (survivor) experience consultants to identify meaningful actions we can take to prevent instances of modern slavery.

Procurement & Supply Chain

> Reviewing feedback on and findings from 2024 supply chain audits to facilitate a continued refining and improvement of a structured programme to support development of supply chain partners. Including delivery of development workshops and defining the benchmark for development of supported action plans.

> Reviewing the different modern slavery related audits to clarify the purpose, responsibility, process and output for each one. To include development of a more robust and specific ethical sourcing audit to focus on the risks in global supply chains for suppliers of goods and materials.

Appendix 1: Balfour Beatty subsidiaries UK

44 Details of related undertakings of Balfour Beatty plc as at 31 December 2024

In accordance with Section 409 of the Companies Act 2006 a full list of subsidiaries, partnerships, associates and joint ventures, including the principal activity, the country of incorporation and the effective percentage of equity owned as at 31 December 2024 is disclosed below. Unless otherwise stated, all interests are in the ordinary share capital or shares of common stock in the entity and are held indirectly by the Company, and all entities operate principally in their country of incorporation. All subsidiaries had a reporting period ended 31 December 2024 and are wholly owned and consolidated into the Group's results, except where indicated.

Subsidiary undertakings incorporated in the United Kingdom

Entity	Principal activity
Q14 Quorum Business Park, Benton Lane, Newcastle upon Tyne NE12 8BU	
Aberystwyth Student Accommodation Ltd	Infrastructure Concession
Balfour Beatty Infrastructure Investments Ltd[i]	Investment Holding Company
Balfour Beatty Infrastructure Partners Member Ltd	Dormant
Balfour Beatty Infrastructure Projects Investments Ltd	Investment Holding Company
Balfour Beatty Investments Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty OFTO Holdings Ltd	Investment Holding Company
Balfour Beatty Rail Corporate Services Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty WorkSmart Ltd	Agent of Balfour Beatty Group Ltd
BBI Holdings Australia Ltd	Dormant
BBPF LLP[iii]	Investment Partnership
Connect Roads Derby Holdings Ltd	Investment Holding Company
Connect Roads Derby Ltd	Infrastructure Concession
Connect Roads Infrastructure Investments Ltd	Investment Holding Company
Consort Healthcare Infrastructure Investments Ltd	Investment Holding Company
East Slope Residencies Facilities Management Ltd	Infrastructure Concession
East Slope Residencies Holdings Ltd	Investment Holding Company
East Slope Residencies Partner Ltd	Investment Holding Company
East Slope Residencies plc[ii]	Infrastructure Concession
East Slope Residencies Student Accommodation LLP[ii][iii]	Infrastructure Concession
Education Investments Holdings Ltd	Investment Holding Company
Initial GP1 Ltd	Investment Holding Company
Manchester Residences (New Cross) Ltd	Infrastructure Concession
South Cambridgeshire Investments Holdings Ltd	Investment Holding Company
Urban Fox Networks (UK) Ltd[vi]	Infrastructure Concession
West Slope Residencies Facilities Management Ltd	Infrastructure Concession
West Slope Residencies Finance Ltd	Infrastructure Concession
West Slope Residencies Holdings Ltd[v]	Investment Holding Company
West Slope Residencies LLP[iii][v]	Infrastructure Concession
West Slope Residencies Partner Ltd	Investment Holding Company
West Stratford Developments Ltd[iv]	Investment Holding Company

Entity	Principal activity
5 Churchill Place, Canary Wharf, London E14 5HU	
Avatar Ltd	Dormant
Balfour Beatty Build Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Building Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty CE Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Civil Engineering (SW) Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Civil Engineering Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Civils Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Const Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Construction (SW) Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Construction International Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Construction Northern Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Engineering Services (HY) Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Engineering Ltd	Dormant
Balfour Beatty Group Employment Ltd	Employer For UK Workforce
Balfour Beatty Group Ltd	Construction & Support Services
Balfour Beatty Homes Ltd	Agent of Manring Homes Ltd
Balfour Beatty International Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Investment Holdings Ltd[i]	Investment Holding Company
Balfour Beatty Management Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Nominees Ltd	Nominee Company
Balfour Beatty Overseas Investments Ltd	Investment Holding Company
Balfour Beatty Overseas Ltd	Investment Holding Company
Balfour Beatty Property Ltd[i]	Agent of Balfour Beatty plc
Balfour Beatty Rail Infrastructure Services Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Rail Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Rail Projects Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Rail Technologies Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Rail Track Systems Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Refurbishment Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Regional Construction Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Utility Solutions Ltd	Agent of Balfour Beatty Group Ltd
Balfour Kilpatrick Ltd	Dormant
BB Indonesia Ltd	Support Services
Balvac Ltd	Agent of Balfour Beatty Group Ltd
Bical Construction Ltd	Agent of Balfour Beatty Group Ltd
Bignell & Associates Ltd	Agent of Balfour Beatty Group Ltd

Entity	Principal activity
Birse Group Ltd	Investment Holding Company
Birse Metro Ltd	Dormant
Bnoms Ltd[i]	Nominee Company
BPH Equipment Ltd	Agent of Balfour Beatty Group Ltd
Cowlin Group Ltd	Dormant
Devonshire House Dormant Three Ltd	Dormant
Guinea Investments Ltd	Investment Holding Company
G. N. Haden & Sons Ltd	Dormant
Haden Building Services Ltd	Dormant
Haden Young Ltd[i]	Dormant
Hall & Tawse Western Ltd	Dormant
Laser Rail Ltd	Agent of Balfour Beatty Group Ltd
Lounsdale Electric Ltd	Dormant
Manring Homes Ltd[i]	Property Investment
Multibuild (Construction & Interiors) Ltd	Agent of Balfour Beatty Group Ltd
Office Projects (Interiors) Ltd	Agent of Balfour Beatty Group Ltd
Raynesway Construction Ltd	Agent of Balfour Beatty Group Ltd
Strata Construction Ltd	Dormant
Hereford Steel Works, Holmer Road, Hereford HR4 9SW	
Painter Brothers Ltd	Agent of Balfour Beatty Group Ltd
Kings Business Park, Kings Drive, Prescot, Merseyside L34 1PJ	
Balfour Beatty Pension Trust Ltd[i]	Pension Fund Trustee
C/O Mc Griggors LLP, Arnott House, 12–16 Bridge Street, Belfast BT1 1LS, Northern Ireland	
Balfour Kilpatrick Northern Ireland Ltd	Dormant
The Curve Building, Axis Business Park, Hurricane Way, Langley, Berkshire SL3 8AG	
Balfour Beatty Ground Engineering Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Infrastructure Services Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Living Places Ltd	Agent of Balfour Beatty Group Ltd
Sunderland Streetlighting Ltd	Agent of Balfour Beatty Group Ltd
Testing and Analysis Ltd	Agent of Balfour Beatty Group Ltd
Maxim 7, Maxim Office Park, Parklands Avenue, Eurocentral, Holytown ML1 4WQ	
Balfour Beatty Construction Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Construction Scottish & Southern Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Kilpatrick Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Rail Residuary Ltd	Agent of Balfour Beatty Group Ltd
Balfour Beatty Regional Civil Engineering Ltd	Agent of Balfour Beatty Group Ltd
BBPFS LP[iii]	Investment Partnership
Glasgow Residences (Kennedy Street) Holdings Ltd	Investment Holding Company
Glasgow Residences (Kennedy Street) LLP[iii]	Infrastructure Concession
Glasgow Residences (Kennedy Street) SPV Ltd	Infrastructure Concession
Hall & Tawse Ltd	Dormant
Initial Founder Partner GP1 Ltd	Investment Holding Company
Midmill Business Park, Tumulus Way, Kintore, Aberdeenshire AB51 0TG	
Balfour Beatty Engineering Services (CL) Ltd	Agent of Balfour Beatty Group Ltd

Entity	Principal activity
Tower Bridge House, St Katharine's Way, London E1W 1DD	
Balfour Beatty Power Construction Ltd	Dormant
Balfour Beatty Power Networks (Distribution Services) Ltd	Dormant
Branlow Ltd	Dormant – In liquidation
Mansell Maintenance Ltd	Dormant
30 Old Bailey, London EC4M 7AU	
Birse Construction Ltd	Investment Holding Company – In Liquidation
Edgar Allen Engineering Ltd	Dormant – In Liquidation
Mansell plc	Investment Holding Company – In Liquidation
West Service Road, Raynesway, Derby DE21 7BG	
Balfour Beatty Plant & Fleet Services Ltd	Agent of Balfour Beatty Group Ltd
C/O Mazars LLP, 100 Queen Street, Glasgow G1 3DN Scotland	
Balfour Beatty Engineering Services (LEL) Ltd	Dormant – In liquidation
Lumina Building, 40 Ainslie Road, Hillington Park, Glasgow G52 4RU	
Shaw-Petrie Ltd	Dormant
42-44 Clarendon Road, Watford, Hertfordshire WD17 1DR	
Barlow & Young, Ltd	Dormant
Haden International Ltd	Dormant
Fourth Floor, 130 Wilton Road, London SW1V 1LQ	
00158345 Ltd	Dormant
01198171 Ltd	Dormant
BICC Dormant One Ltd	Dormant
Devonshire House Dormant One Ltd	Dormant
Third Floor Devonshire House, Mayfair Place, London W1X 5FH	
BICC Thermoheat Ltd	Dormant

Notes

(i) Held directly by Balfour Beatty plc.
(ii) 80% owned.
(iii) Partnership interests held.
(iv) 31 March year end.
(v) 81% owned.
(vi) The Group holds a 77.8% direct interest in Urban Fox Networks (UK) Ltd and an indirect interest of 5.6% through the Group interest in Urban Electric Networks Ltd.

Think before you print!
You can find our Sustainability Strategy online at balfourbeatty.com/sustainabilitystrategy

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