

2026 Modern Slavery Statement: Summary for our Supply Chain Partners

Balfour Beatty's 2026 Modern Slavery Statement [modern slavery statement](#) outlines the steps we have taken to prevent modern slavery, labour exploitation and human trafficking across our operations and supply chain during 2025, and sets out our priorities for the year ahead.

While robust controls mean the risk within our direct operations remains relatively low, we recognise that the greatest risks continue to sit within complex, multi-tiered supply chains, particularly in labour-intensive activities and lower tiers. With approximately two thirds of our revenue spent procuring goods and services from external partners, we take seriously our responsibility to ensure this spend is ethical, responsible and supports workers' rights.

We expect our supply chain partners to work with us proactively and transparently to identify, manage and mitigate these risks, embedding robust controls within their own operations and supply chains.

Supply chain partner pre-qualification

All supply chain partners are required to demonstrate how they manage modern slavery and labour exploitation risks as part of the pre-qualification process, including providing a Modern Slavery Statement where appropriate.

Suppliers are expected to maintain this information on an ongoing basis. This includes **reviewing and updating their Modern Slavery Statement and wider approach at least annually**, ensuring it reflects current operations, emerging risks and any improvements made over time.

We continue to support suppliers through guidance, templates and practical resources to strengthen approaches to human rights due diligence and governance. Where there is a persistent failure to engage with these requirements, we will review the suitability of that organisation to remain within our supply chain.

Supply chain assessment and due diligence

We continue to proactively assess and engage with supply chain partners to understand how risks are managed in practice and to support continuous improvement.

Suppliers are expected to take a similarly proactive, risk-based approach within their own organisations.

This includes:

- > Identifying and prioritising higher-risk areas within their supply chain (e.g. labour supply, subcontracting and materials sourcing)
- > Undertaking proportionate due diligence to assess and manage those risks
- > Seeking to improve visibility beyond their direct suppliers, recognising that risks often sit in lower tiers.

During 2025, we strengthened our focus on supplier maturity, deeper risk assessments and follow-up activity to measure improvement over time. We also continued to develop our approach to supply chain transparency, helping to identify where additional due diligence may be required.

In 2026, we will continue our risk-based programme of supplier assessments, with a particular focus on higher-risk categories and emerging areas of risk, including materials supply chains and multi-tier transparency.

Training and capability building

Balfour Beatty remains a funding partner and Gold member of the Supply Chain Sustainability School and continues to support its Modern Slavery Working Group.

The School provides free training, guidance and practical resources covering modern slavery, ethical recruitment, responsible sourcing and supply chain due diligence. In addition, we are developing further learning through our EDGE Academy programme.

We expect supply chain partners to:

- > **Engage with available training and resources** to strengthen awareness and capability
- > **Ensure relevant training is accessible to their workforce.**

Where appropriate, **support awareness and capability building within their own supply chains**

Building capability across the supply chain is a critical component of preventing exploitation and improving outcomes for workers.

Our expectations of supply chain partners

We expect all supply chain partners to uphold the same high ethical standards that we set for ourselves. These expectations are set out in our Code of Ethics, Supplier Sustainability Conditions and Sustainable Procurement Policy, and form part of our contractual requirements.

At a minimum, suppliers must:

- > Treat all workers fairly, with dignity and respect
- > Identify and manage modern slavery and labour exploitation risks
- > Conduct appropriate right-to-work and employment checks
- > Ensure workers receive clear terms and conditions
- > Pay workers correctly and on time
- > Prohibit recruitment fees being charged to workers
- > Provide safe working conditions and appropriate welfare facilities
- > Cooperate openly with audits, assessments and improvement activities
- > Escalate concerns promptly where risks are identified.

These requirements represent a baseline standard, and we expect suppliers to demonstrate how these are implemented in practice within their business and supply chains.

Understanding and preventing worker exploitation

We encourage supply chain partners to recognise that labour exploitation can exist on a spectrum and may not always meet the legal definition of modern slavery. Indicators such as excessive working hours, withheld documentation, unfair deductions, intimidation or poor living conditions may represent early warning signs. Early identification and intervention are critical to preventing harm. Suppliers should ensure that relevant personnel are able to recognise these indicators and take appropriate action where concerns arise.

Clear checks, processes and worker protections

We expect all supply chain partners providing goods or services to our UK operations to implement robust employment and right-to-work checks, and to ensure workers understand their rights.

These expectations apply regardless of where a supplier is based. For international operations, equivalent standards should be applied in line with local legal requirements and recognised international human rights frameworks.

All workers should:

- > Have the legal right to work
- > Receive written terms of employment
- > Be paid at least the applicable legal minimum wage
- > Retain possession of their identity documents
- > Be free to leave employment in accordance with their contract
- > Receive clear information on pay and working conditions.

We also encourage suppliers to engage directly with workers to understand their experiences and identify concerns at an early stage.

Raising concerns – Speak Up

Creating an environment where workers feel able to raise concerns is one of the most effective ways of identifying and addressing risks.

Balfour Beatty's independently managed Speak Up service is available to employees, supply chain partners and members of the public, and allows concerns to be raised confidentially.

We expect supply chain partners to:

- > **Actively promote Speak Up** (or equivalent reporting mechanisms) to workers engaged on our projects
- > Ensure workers understand how to raise concerns safely
- > Foster a culture where concerns are taken seriously and addressed without retaliation.

Looking ahead

In 2026, our focus will continue to be on strengthening supply chain transparency, improving risk visibility, increasing worker voice and embedding a more preventative approach to identifying and addressing labour exploitation.

We expect our supply chain partners to work with us openly and collaboratively to:

- > Improve transparency across supply chains
- > Strengthen due diligence and risk management practices
- > Support worker voice and effective escalation
- > Contribute to continuous improvement across the sector.

Balfour Beatty remains unwavering in its commitment to ethical business practices. We will not knowingly work with organisations that disregard human rights or fail to take appropriate action to prevent modern slavery and labour exploitation. The human cost of inaction is unacceptable, and we must work together to prevent these abuses wherever they occur.