

Modern Slavery Act 2015

Modern Slavery Statement

September 2025

Introduction

Trading ethically, sourcing responsibly, and preventing modern slavery within our organisation and supply chain is a fundamental part of our values. We believe it is our responsibility to take meaningful action to combat this abuse of human rights.

This statement outlines the key activities we have undertaken during the past financial year. It details our governance structure, risk assessment processes, due diligence, and our goals for continuous improvement. We are committed to transparency and to building on our progress year-on-year.

Our definition of modern slavery aligns with the International Labour Organisation (ILO) and includes forced labour, debt bondage, human trafficking, servitude, and the worst forms of child labour.

Our organisation & business

This statement applies to tp bennett LLP (referred to as 'tp bennett') and its group undertakings as they existed during the financial year 01 April 2024 – 31 March 2025 (the 'reporting period'), including tp bennett Services Limited.

We are a leading UK design practice delivering architecture, interiors, and planning consultancy. With a turnover of £48 million in the last financial year, we operated from studios in London, Manchester, and Leeds in the UK.

Significant post-period development:

Subsequent to the end of this reporting period, in May 2025, tp bennett acquired Bluehaus, a design and engineering company based in the UAE, and operating in Dubai, Abu Dhabi, and Riyadh (Saudi Arabia).

No interrogation of Bluehaus's operations or supply chains was conducted in this reporting period, and integrating Bluehaus into our business operations (including supplier assessment and prevention of modern slavery) is our highest priority for the next reporting period.

Our supply chains

We recognise that our greatest exposure to modern slavery risk lies within our supply chains. For the period covered by this statement, our supply chains were UK-focused. We mapped our tier 1 suppliers as follows:

- **Professional services:** Third-party sub-consultants with whom we partner on client projects (e.g., engineers, specialist designers, surveyors, etc.)
- **Operational & business support services:** Suppliers supporting our UK offices. This category includes areas we have identified as carrying a higher potential risk, such as:
 - Facilities management: Cleaning, security, and catering services
 - Office equipment & supplies: The supply of hardware, electronics, furniture and other goods for our studios
- **Labour supply chain:** We directly employ all of our staff, but we recognise the risk within the labour supply chains of our contractors, particularly in their recruitment of workers for our facilities management services

We acknowledge that visibility beyond our tier 1 supply chain is a challenge. A goal for the future is to work with our key consultants and suppliers to better understand their own supply chains.

Our policies

Our Modern Slavery policy is the cornerstone of our commitment to act with integrity. Responsibility is held at board level and delegated to our Modern Slavery Committee. This policy is supported by a framework of procedures that embed our ethical standards into our operations:

- **Employee protections:** We check all employees' eligibility to work in the UK and ensure that they are paid into a personal bank account in their name. We pay everyone above the Real Living Wage. We are a certified Living Wage Employer, a standard we are working to extend to our cleaning and security contractors
- **Whistleblowing policy:** We provide a clear and confidential process for employees to report any concerns without fear of retaliation
- **Supplier Code of Conduct:** We are developing a formal Code of Conduct to be rolled out in the next financial year. This will contractually require suppliers to adhere to our standards, which will include fair wages, prohibiting worker-paid recruitment fees, ensuring freedom of association, and maintaining safe & healthy working conditions
- **Responsible purchasing:** Our procurement processes are being updated to ensure that ethical considerations, not just cost, are a primary factor in supplier selection. We have a third-party management process, which verifies our professional services consultants' compliance under the Modern Slavery Act. We are rolling out this new procedure under a phased programme and aim to bring all suppliers into scope within the next two years
- **Alignment to recognised standards:** We align our business operations to the UN Sustainable Development Goals, which include the protection of labour rights and responsible supply chain stewardship
- **Information sharing:** We provide staff with industry-specific compliance and management updates and awareness training through the 'tpb Academy' staff intranet page, which includes matters related to modern slavery

During the reporting period, this policy framework applied to our UK operations. A primary goal for the next financial year will be to review, adapt, and extend these policies across the newly acquired Bluehaus business.

Risk assessment & management

In line with government guidance, we will conduct an annual, detailed risk assessment focused on the potential harm to people. Our Modern Slavery Committee reviews our risks during the reporting period.

We identified and assessed areas of modern slavery risk as follows:

1. **Supplier & commodity risk – Medium to high:** We have long-standing, trusted relationships with the majority of the consultants and suppliers with whom we work regularly in the delivery of our services and management of our business. The highest risk is in our operational supply chain, specifically in services that rely on low-wage or migrant labour, such as cleaning and security.

There is a recognised risk in the manufacturing of commodities such as electronics, furniture, carpet, etc., where supply chains can be complex and opaque. This affects both our business purchasing and the specification of building and interiors products for our projects (see below).

2. **Sector risk – Medium:** While we are designers and not constructors, we operate within the high-risk construction industry. Our influence, and therefore our risk, is associated with the materials and products we specify. Our in-house digital library, ADLib, helps mitigate this by requiring suppliers listed thereon to adhere to a responsible sourcing charter.
3. **Jurisdiction risk – Low to medium:** This risk was primarily linked to a small number of projects in higher-risk regions. Following the acquisition of Bluehaus, we assess that our jurisdiction risk will rise in the next reporting period.

Due diligence processes & remediation

Our due diligence process is risk-based. The activities below were conducted for selected members of our UK supply chain during the reporting period:

- **Sub-consultant onboarding:** We began a phased audit of incumbent sub-consultants (>£50k contract value) to verify their compliance against the PAS91/ Common Assessment Standard (CAS) questionnaire. This is a standard prequalification route within the construction industry and includes question sets that cover anti-slavery, anti-discrimination, reporting & grievance processes, amongst other business and service management topic areas
- **Worker voice & grievance:** We have had initial conversations with our key facilities management contractors to discuss the payment of the real living wage. As a certified employer with the Living Wage Foundation, this is subject to a separate, monitored programme. In line with government guidance, we will include the implementation of worker voice policies (awareness of rights, working conditions, access to effective grievance mechanisms, etc.) in all future activities

Our approach to remediation

Our commitment to a victim-centred approach is universal. We will extend this remediation framework to our new operations, ensuring it is adapted to local legal and cultural contexts while upholding international standards. If an incident is identified, our process would first be to call in expert advisory and, with their support:

1. **Prioritise safety:** Ensure the immediate safety and well-being of the affected individual(s).
2. **Investigate:** Conduct a thorough investigation with all parties involved to understand the root cause.
3. **Remediate harm:** Work with all parties to create a corrective action plan focused on remediating the harm (e.g., repayment of recruitment fees, improving working conditions, etc.).
4. **Responsible disengagement:** Terminating a contract is a last resort, as it can inadvertently harm vulnerable workers. We would only do so after failed attempts at remediation or in cases of severe exploitation.

Training

To embed awareness across our practice, we have rolled out mandatory online learning and guidance to all UK-based staff. This covered the fundamentals of modern slavery, how to spot the signs, and how to report concerns.

An adapted version of this will be included in our induction programme for all new starters during the next reporting period.

Our aim is to create and maintain awareness and understanding of modern slavery for all our people, whether they encounter it in their work or private lives, and what to do if this happens.

Our effectiveness in combating modern slavery & human trafficking

We have not received any reported concerns related to modern slavery in our own operations.

The steps we are taking and processes we are implementing to prevent modern slavery in our business and supply chains, and equipping our people with the knowledge and means to report any incidences they encounter, or suspicions that might arise, will we hope prove effective in achieving our own desire to play our part in the eradication of modern slavery. It will also add strength to the national and global cause.

Progress on previous period's goals

Our goals for 2024-25 were purposely agile because we were eager to achieve what we had set out to do. The progress below relates to our UK operations:

- Reviewed, updated, and republished our Modern Slavery policy
- Continued the development and implementation of a suitable supply chain management system that includes interrogation of our suppliers' anti-slavery commitments and their effectiveness
- Online awareness training was rolled out to 100% of UK staff, with 85% completing the session
- Continued to engage with initiatives in our profession and the wider construction industry who develop best practice in this area (Stronger Together, Living Wage Foundation)

Goals for the next period

Following steady progress on the goals we set ourselves in 2024-25, we intend to take the following steps to build on our achievements during the next period:

- **Integrate Bluehaus:** Our foremost priority is to begin the full integration of Bluehaus into our modern slavery framework. This will involve a comprehensive risk assessment of their operations and supply chains, extending our policies and code of conduct, and beginning the development of due diligence processes in the UAE, and Saudi Arabia
- Review, update, and republish our modern slavery policy annually
- Introduce an *annual* modern slavery risk assessment across the expanded group
- Continue the development and implementation of our supply chain management system, which includes examination of our consultants' and suppliers' anti-slavery commitments
- Develop a Supplier Code of Conduct in line with ADLib and begin the integration of this into all new contracts across the expanded group
- With the support of the Living Wage Foundation, continue to engage with our key business support contractors
- Continue to deliver modern slavery governance activities, such as scheduled compliance training for all staff, targeted training for relevant members of staff, and inductions for new employees
- Continue to engage with initiatives in our profession and the wider construction industry who develop best practice in this area (Stronger Together, Living Wage Foundation)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the financial year ending 31 March 2025.

It was approved by the main board on 22 September, 2025.

It will be next reviewed in September 2026.



Nenad Manasijevic
Principal Director



Mark Davies
Principal Director

Date: 25 September 2025