BroadwayMalyan BM

Modern Slavery and Human Trafficking Statement
Financial Year ending April 2026

31 October 2026

Broadway Malyan Holdings Limited and our subsidiary companies (together “Broadway Malyan”) remain committed to the principles of the UK Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Introduction

Broadway Malyan Holdings Limited and our subsidiary companies (together "Broadway Malyan") remain committed to the principles of the UK Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We are committed to improving practices across our business and maintaining procedures and controls designed to ensure modern slavery or human trafficking is not taking place in our business or supply chain globally.

This renewal of the commitment is set against an understanding of the challenges and issues facing society such as cost-of-living pressures, armed conflict, the forced displacement of people, and continuing global economic uncertainty, appreciating how such issues can heighten the risk of exploitation, modern slavery and trafficking.

It continues to be a priority for Broadway Malyan to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our business and in our supply chain. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain, including: compulsory training for all colleagues worldwide on modern slavery principles, reviewing protocols for undertaking bid work and commencing new projects (including due diligence requirements for sub-consultants), and maintaining compliance requirements in our standard form contracts.

Our Organisation and Supply Chain

Broadway Malyan is a global architecture, urbanism and design practice dedicated to creating cities, buildings and places that will provide a lasting legacy. Through a shared design ethos, we work together to create places with a strong sense of identity where people and communities want to live, learn, shop, work and relax.

Broadway Malyan Holdings Limited (CRN: 05418411) is the parent company of the Broadway Malyan group. We have approximately 350 employees worldwide and operate in the United Kingdom, Europe, Africa, the Middle East, Asia Pacific and the Americas. During the 2025-26 financial year, we had a global annual turnover of £46,990,000.

Our business is organised into eleven business units comprising the following subsidiary companies (business units described in brackets):

1. Broadway Malyan Limited (UK);
2. Broadway Malyan Portugal Arquitectos e Designers Lda (Portugal) and Broadway Malyan Projects e Design Ltda (Brazil);
3. Broadway Malyan España Arquitectos & Designers S.L.U. (Spain) and Broadway Malyan Arquitectura Chile Limitada (Chile);
4. Broadway Malyan Architekci i Projektanci Sp.zo.o (Poland);
5. Broadway Malyan (Shanghai) Company Limited (China);
6. Broadway Malyan Asia Pte. Limited (Singapore);
7. Broadway Malyan India Private Limited (India);
8. Broadway Malyan Abu Dhabi and Broadway Malyan Dubai, as branch offices of Broadway Malyan Limited (UAE);
9. Will + Partners Limited and Will + Partners Architecture Limited (Will + Partners);
10. Nexus Planning Limited (Nexus Planning); and
11. Stitch Studio Limited (Stitch).

This statement applies to all our business units outlined above.

Our supply chain primarily comprises professional consultancy providers, acting as sub-consultants. We also engage with suppliers of services for our offices, such as, facilities management, IT, insurance and office equipment.

We seek to partner with suppliers whose ethical principles align with our own. We expect our suppliers to operate fair and ethical workplaces, and share the commitment to ensuring that modern slavery and human trafficking is not taking place. Our standard form sub-consultant contracts include, where possible, a contractual provision

ensuring compliance with the UK Modern Slavery Act 2015, and we seek to include an equivalent provision where we contract on a counterparty's terms.

Our Policies on Slavery and Human Trafficking

We have policies which govern modern slavery and human trafficking, and highlight the importance of proper management of recruitment, and cover the standards we expect of our employees. We have the following additional policies in place relevant to modern slavery, which we continuously review and update:

- Whistleblowing;
- Ethical Sourcing Policy;
- BM Induction Booklet; and
- Grievance policy for supply chains.

These policies reflect our commitment to acting ethically and with integrity in all our business relationships, and include steps to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and or our supply chains.

Due Diligence Process for Slavery and Human Trafficking

Our Risk, Audit & Legal Committee has oversight of identifying and mitigating any modern slavery risks within our supply chain and engages with parts of the business which could be more at risk. Our Risk, Audit & Legal Committee reports to the Board of Directors.

We also have in place systems to:

- Identify, assess and monitor potential risk areas in our supply chains. Broadway Malyan's protocols for undertaking bid work and commencing new projects were reviewed and updated in 2025;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- Encourage voluntary reporting and to protect whistle blowers in accordance with our global whistleblowing policy. All employees can approach the Whistleblowing Officer with any concerns.

Risk Assessment

Our work is predominantly with large developer clients to whom we provide architectural and design services, and whose businesses are transparent, visible and subject to considerable stakeholder oversight. Those businesses themselves, like Broadway Malyan, will often be required to produce a statement each year and be committed to tackling Modern Slavery and Human Trafficking.

It is possible that we may be novated to building contractors during the life cycle of a project, and in light of this, we are selective and careful with regards to which companies we agree to work with or be novated to, and the terms of such engagement.

We employ highly educated and highly skilled professionals. We ensure compliance with market standards and national minimum wage obligations. We carry out due diligence on our third-party suppliers and require them to comply with all applicable laws, statutes and regulations.

We have identified that the key area of risk in our supply chain is the risk of third-party companies employing low skilled migrant workers. We mitigate this risk by working only with reputable third parties, many with whom we have built long term and strong relationships.

In addition to the above, as part of our initiative to identify and mitigate the risk of slavery and human trafficking, we have carried out a risk assessment of our business and supply chains, and analysed the following potential external risk areas as follows:

- **Country risk**: we operate and have offices throughout the world, including in the Middle East, Asia and the Americas. We recognise the heightened risk of labour exploitation affecting low-paid and migrant workers in some of these jurisdictions. To mitigate this risk we apply the same high standards across all of our offices worldwide as we apply in the UK, including as to lawful recruitment, pay and working conditions, and we extend these expectations to the sub-consultants and suppliers we engage locally.

- **Sector or industry risk**: whilst we operate in the construction sector which is seen as a higher risk sector we are an architectural and design services business and not directly involved with construction contract awards and the supervision of construction sites. As outlined above we work with our local subconsultants to comply with all applicable laws, statutes and regulations as part of the tender requirements and site practices by contractors wherever possible.

- **Business or transactional risk**: we consider the risk here to be low. As outlined above we carry out due diligence in relation to our sub-consultants and ensure that they have appropriate measures in place to safeguard against the occurrence of slavery and human trafficking within their company and supply chains, such as the completion of a sub-consultant on-boarding checklist.

We also have in place systems to identify and assess potential risk areas in our supply chains and protect whistleblowers.

Our Effectiveness in Combating Slavery and Human Trafficking

In the three prior financial years and to date, we have not received any reported concerns relating to modern slavery or human trafficking.

We have zero tolerance to slavery and human trafficking.

We continue to monitor and review our policies and procedures to ensure their ongoing effectiveness.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, staff receive our existing policy as part of their induction package. In addition, Broadway Malyan delivers business training across all of its studios on a regular basis, incorporated within that, training on the modern slavery and human trafficking policy. Modern slavery training is compulsory for all colleagues worldwide. Our colleagues were last trained on modern slavery principles in 2026, with a completion rate of 98%.

Further Steps

Following a review of the effectiveness of the steps we have taken this year, we report the following progress against the commitments made in our previous statement: (i) we have introduced an Ethical Sourcing Policy; and (ii) we have established a key performance indicator measuring completion of modern slavery training, with a completion rate of 98% this year.

During the coming year, we intend to: (i) roll out a new operations platform, which will help to strengthen our onboarding processes for new employees (including right-to-work checks and delivery of training to new colleagues); (ii) review our sub-consultant and supplier due diligence procedures, including our onboarding checklist; and (iii) introduce further key performance indicators such as measuring the proportion of our supplier contracts containing a modern slavery provision.

Board Approval

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Broadway Malyan's modern slavery and human trafficking statement. The board of Broadway Malyan Holdings Limited approved this statement on 26 October 2026 for the financial year ending 30 April 2026. This statement is published on our website and has been submitted to the UK Government's modern slavery statement registry.

Signed



Ian Apsley
Chief Executive Officer
For and on behalf of Broadway Malyan Holdings Limited

Dated: 31 October 2026