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MODERN SLAVERY STATEMENT 2026

INTRODUCTION

Bidwells LLP ensures that all potential modern slavery risks related to its business are understood and that steps are in place that aims to ensure there is no slavery or human trafficking within its own firm, its clients and supply chains.

Bidwells' supply chain in relation to services consists of the whole of other regulated professional services (Chartered Surveyors, Law Firms, Accountancy Firms and Banks). Bidwells considers these to be very low risk in relation to slavery and human trafficking however Bidwells maintain a risk-based approach to assess the likelihood of the existence of Modern Slavery in our supply chain.

This statement is made under section 54 (1) of the Modern Slavery Act 2015 (MSA)

Bidwells acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015.

EMPLOYMENT STANDARDS

Bidwells recruitment process ensures that all potential employees are checked to ensure they are eligible to work in the UK, in accordance with the Asylum and Immigration Act 1996.

Bidwells provides modern slavery awareness training to all staff providing them with an awareness and understanding of their role.

Our policies and procedures are reviewed regularly to make sure that they are fit for purpose and compliant with regulatory and statutory obligations. Where required, new policies are agreed through the relevant governance structure.

There are a number of policies and procedures in place that contribute to ensuring modern slavery does not occur within our firm. These are reviewed on an annual basis and include:

- Equality, Diversity & Inclusion Policy
- Anti-harassment and Anti-bullying Policy
- Values and Competency Framework
- Anti Bribery Policy & Anti-money Laundering Policy
- Recruitment Policy and Procedure
- Background / Pre-employment screening policy which includes the requirement to undertake references and checks for eligibility to work in the UK
- Health and Safety Policy

- Whistleblowing Policy and Procedure - which protects staff should they raise concerns about issues such as modern slavery
- Domestic Violence Policy
- Safeguarding Policy
- Supplier Code of Conduct

SUPPLIERS

Bidwells ensures that all potential modern slavery risks related to its business are understood and that steps are in place that aim to ensure there is no slavery or human trafficking within its own firm, clients and supply chains. Bidwells Modern Slavery Statement reflects our commitment to acting in an ethical manner and with integrity in all of our Supplier relationships and to implementing and enforcing effective systems and controls to ensure that Modern Slavery and Human Trafficking is not taking place anywhere within our supply chains. Bidwells expect that all Suppliers will act in accordance with the UK Modern Slavery Act 2015 if applicable, or any similar laws in the countries in which they carry out business to ensure that no employee or individual working in any supply chain is being exploited. In addition, Bidwells would expect that all employees are working within a safe environment and that all relevant employment, health and safety and human rights laws and international standards are followed.

To further our high standards, Bidwells believe it is important to share the key principles and best practice standards Bidwells consider crucial to sustaining effective and enduring business relationships with all third-party suppliers and their affiliates and subcontractors, which provide goods or services to Bidwells with a Supplier Code of Conduct.

Supply Chain Management and Due Diligence

Our supply chain is rigorously managed through a combination of the SafeContractor platform and our internal Pre-Qualification Questionnaire (PQQ) process. These due diligence processes are designed to vet the ethical and operational standards of our partners before engagement. Bidwells expect that all suppliers will act in accordance with the UK Modern Slavery Act 2015, or any similar laws in the countries in which they carry out business, to ensure that no employee or individual working in any supply chain is being exploited. Furthermore, Bidwells require that all employees work within a safe environment and that all relevant employment, health and safety, and human rights laws and international standards are followed.

Risk Assessment and High-Risk Categories

Bidwells proactively identifies parts of its business and supply chains where there is a higher risk of slavery and human trafficking. Bidwells have identified specific high-risk categories that require enhanced scrutiny, including:

- **Construction and Site-Based Works:** including lifting operations, gas installations, and utility works adjoining highways.
- **Land and Estate Management:** including tree works such as felling, emergency tree care, and large-scale planting or landscaping.
- **Facilities and Infrastructure Maintenance:** including cleaning, security, sewerage and drainage works, oil and water tank replacement, and building façade works.
- **Specialist Subcontracted Services:** including activities requiring permits such as working at height, hot works, confined space entry, and asbestos removal.

To manage these risks, Bidwells utilise SafeContractor to continuously monitor our supply chain. This platform enables us to track contractor compliance in real time and supports our commitment to ensuring that all

partners meet the high standards Bidwells require in relation to health, safety, ethical conduct, and worker protection.

Effectiveness and Performance Indicators

In 2026, to further reinforce our ethical standards, Bidwells will implement an enhanced annual audit programme. Every three months, Bidwells will audit a selection of our high-risk contractors via SafeContractor, with the aim of auditing 5% of our high-risk supply chain by the end of each year. As part of this programme, Bidwells will also review whether any incidents have occurred and assess how our suppliers monitor and verify the integrity of their own supply chains.

Our compliance target is zero instances of modern slavery or high-risk “red flags” identified without an immediate and robust remediation plan. This rolling audit cycle ensures that the modern slavery statements Bidwells hold are supported by consistent, evidence-based workplace practices, and enables us to respond swiftly to any changes in supplier status.

Incident Reporting

In the event that an incident of modern slavery is identified, Bidwells requires immediate transparency and encourage reporting of concerns through our established whistleblowing policy and procedure. Bidwells must be informed of the nature of the incident, the actions taken by the supplier to address it, and the remediation provided to affected individuals. Bidwells will then undertake a formal review to determine the future of the business relationship, ensuring that worker safety and our ethical obligations remain paramount.

Training and Awareness

To ensure these values are embedded throughout our organisation, Bidwells provides ongoing awareness through our Continuing Professional Development (CPD) programme. This includes dedicated modules on Procurement, where key topics such as modern slavery and human trafficking are addressed. Everyone in the firm undertakes online training on our Learning Management System (LMS) for Modern Slavery every two years, this is a key part of Building transparency and ensuring our colleagues understand and address risks in their supply chains. This includes knowing what to look for and how to act when concerns arise. This approach ensures that all our colleagues involved in purchasing and supply chain management are equipped to identify potential risks and uphold Bidwells’ commitment to responsible and ethical business practice.

DUE DILIGENCE PROCESSES

Bidwells employs a structured due diligence approach that includes:

Pre-Contractual Measures

- Verification of suppliers’ adherence to modern slavery legislation
- Review of suppliers’ own policies, statements and risk-management processes during 3 stage tender process, which includes where SafeContractor SSiP accreditation Mandatory acceptance of our **Supplier Code of Conduct** and contractual obligations relating to forced labour, worker rights and remediation

Ongoing Monitoring

- Annual or risk-based reassessments of key suppliers
- Integration of modern slavery checks into procurement and contract renewal processes

- Escalation processes where concerns are identified, including corrective action plans and, if necessary, termination

Remediation

Where an issue is raised, Bidwells will work with the supplier to investigate, resolve, and prevent recurrence. Bidwells will not knowingly work with any party involved in modern slavery.

FUTURE REVIEWS

In 2026 Bidwells are looking to Develop KPIs focused on real impact and outcomes; strengthen due diligence for subcontracted works on projects; expand supply-chain mapping for high-risk service lines and increase internal training coverage across high risk areas. To include Managers involved in procurement or supplier engagement receiving additional guidance on spotting risk indicators and escalation procedures.

Bidwells continue to review and develop our processes to mitigate the risk of Modern Slavery and remain fully committed to implementing any necessary changes across the firm.

This Statement was reviewed and approved by Nicholas Pettit



Nicholas Pettit

Senior Partner, Bidwells LLP

