

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) and constitutes our company's modern slavery and human trafficking statement for the financial year ending 31 December 2025. This statement has been approved by our Managing Director, Pino De Rosa.

Commitment to Ethical Business

Bridgeway is committed to operating the business with the highest ethical standards and respecting human rights throughout our operations and supply chain. We are dedicated to preventing modern slavery, servitude, forced labour, and human trafficking (collectively referred to as "modern slavery") in all its forms.

Structure and Supply Chains

We are a Civil Engineering Consultancy working in the UK, with a head office in Nottingham and other sites in Watford and Croydon. We operate predominantly in the UK rail sector and are a Principal Contractor for Network Rail. Most of our consumables are purchased from UK suppliers. This includes vehicles, stationery, PPE, IT and site-based equipment and materials. Where possible we will always go direct to manufacturer to keep the supply chain short. In addition, we use a handful of Specialist UK labour agencies to meet short term staffing needs.

Bridgeway will never knowingly tolerate slavery or forced labour, and no one shall be required to perform forced or compulsory labour for or on behalf of Bridgeway Consulting Limited or its partners. During the last financial year, we were not made aware of any allegations of human trafficking / slavery activities against any of our suppliers. If we were to be made aware of such allegations, we would act immediately and work with our supplier and any necessary authorities to address any issues.

Our assessment suggests that the risks of slavery and human trafficking taking place in our operations and supply chains are relatively low, but we are not complacent. We are committed to working with our suppliers to ensure that they uphold the same ethical standards as ourselves.

Risk Assessment and Management

We adopt a risk-based approach to identifying and managing modern slavery risks.

Key Risk Areas Identified

- Labour supply chains (agency and contingent labour)
- Subcontracted site works
- Lower-tier suppliers where visibility is limited
- Geographical risk associated with sourced materials

We recognise that identifying no risk does not indicate absence of risk, and we continue to strengthen our processes to improve detection and visibility.

Policies and Procedures

We have developed and implemented several policies and procedures to identify and mitigate the risk of modern slavery in our business and supply chains. These include:

- **Modern Slavery Policy:** Our policy sets out our commitment to preventing modern slavery and outlines the steps we take to achieve this.
- **Whistle Blowing Policy:** We encourage all employees, contractors, and suppliers to report any suspicions of human slavery without fear of retaliation.
- **Supplier Code of Conduct:** Our Code of Conduct sets out our expectations of suppliers regarding ethical labour practices, including a prohibition on modern slavery.
- **People and Development:** our People Policies and Recruitment Procedures demonstrate our commitment to ensuring that all our employees and contractors that we Sponsor to work on the Rail, have the Right to Work in the UK.
- **Risk Assessment:** We conduct risk assessments to identify areas of our business and supply chains where the risk of modern slavery is highest.

- **Due Diligence:** We conduct due diligence on our suppliers before entering business with them, and on an ongoing basis. This includes reviewing their policies and practices and conducting audits where necessary.
- **Training:** We provide training to our employees on modern slavery awareness and how to identify and report potential issues.

Performance and Measures

We are committed to continuously improving our efforts to prevent modern slavery. During the financial year ending 31st December 2025, we:

- Conducted Risk based assessments of key suppliers.
- Reviewed and updated our Modern Slavery Policy to align with current guidance
- Delivered training on modern slavery awareness to key employees.
- Increased engagement with suppliers on modern slavery issues through industry engagement and communications.
- Improved our Due Diligence and Risk Assessment in line with Modern Slavery Assessment Recommendations

We will continue to monitor the effectiveness of our measures and identify areas for improvement. Our Senior Leadership Team have overall responsibility for compliance with the Act, and review progress and any concerns annually during Board Meetings.

Combating Slavery and Human Trafficking during 2026

We are committed to ongoing improvements in our efforts to prevent modern slavery. In the coming year, we will focus on:

- Mapping our key supply chains beyond Tier 1, with a focus on labour supply.
- Developing a more structured supplier modern slavery questionnaire for higher-risk suppliers and subcontractors
- Develop practical measures to monitor effectiveness, including training completion, supplier assessments undertaken, risks identified, and corrective actions closed.
- Monitor changes in legislation, guidance, and client expectations to ensure our approach remains current and proportionate.

Reporting Concerns

We encourage anyone who has concerns about potential modern slavery in our business or supply chains to report them. Concerns can be reported confidentially through the following channel:

- To Lisa Brackner, Director of People & Development
- Lisa.brackner@bridgeway-consulting.co.uk

Further Information

This statement provides a summary of our approach to modern slavery. We are committed to transparency and encourage stakeholders to contact us with any questions.

Approval

This statement was approved by the Managing Director of Bridgeway Consulting Ltd on 30 June 2026



Pino De Rosa
Managing Director
Bridgeway Consulting Ltd