

MODERN SLAVERY ACT

Transparency Statement

By: Gardiner & Theobald LLP

Introduction

G&T provides a wide range of professional construction consultancy and related professional services. This Statement sets out G&T's actions taken to comply with the Modern Slavery Act 2015 during the financial year ending 30 April 2018 and was approved by G&T's Management Board on 12 February 2019.

Organisational structure, countries of operation and supply chains

G&T is a limited liability partnership registered at Companies' House under number OC307124, and is headquartered in London.

Process

Organisations that provide goods or services to G&T are subject to appropriate due diligence. They are required to confirm they and their own supply chains are free from human trafficking and slavery.

High-risk activities

The following activities are considered to be at risk of modern slavery within G&T and the list will be reviewed and updated from time to time:

- Provision of materials supplied to G&T (such as marketing materials) which may be produced in jurisdiction or by organisations that are not compliant with such legislation
- Use of staff by suppliers to G&T, where the suppliers' processes are not compliant
- Employment of sub consultants, suppliers and sub-contractors by G&T, where their work practices may be non-compliant

Responsibility

Responsibility for G&T's anti-slavery initiatives is as follows:

- **Statement:** The modern slavery statement has been drafted by key personnel, and has been approved by the Management Board
- **Investigations/due diligence:** G&T has included specific questions in its due diligence enquiries for new and existing sub-consultants, contractors and suppliers
- **Training:** A training programme is being developed to ensure understanding of modern slavery. The internet based training resource will be available for all the G&T group, both in the UK and overseas, and where necessary, appropriate consultants suppliers and contractors
- **Right to Work:** G&T uses IDscan to verify the validity of staff identification documents and to establish the legal right to work

Relevant policies

G&T operates the following relevant policies:

- **Modern Slavery Policy:** G&T has a modern slavery policy setting out its commitment to prevent modern slavery within its corporate activities.
- **Whistleblowing Policy:** G&T's policy encourages reporting of any concerns related to the direct activities or the supply chains of G&T. It is designed to make it easy for all staff to make disclosures, without fear of retaliation. Employees, subcontractors, clients or others who have concerns can contact the Managing Partner or HR Partner confidentially or can make a confidential disclosure.
- **Employee Code of Conduct/Ethics Policy:** G&T's code clarifies actions and behaviour expected of staff when representing G&T, and mirrors the RICS ethics code.
- **Recruitment/Agency Workers Policy:** G&T uses specified, reputable employment agencies to source staff.
- **Corporate Social Responsibility Policy:** G&T's core values are performance, honesty, uniqueness, dependability, responsibility and quality. Our CSR policy has been amended to include specific reference to modern slavery.

Due diligence

G&T undertakes appropriate due diligence with new suppliers, and regularly reviews its existing suppliers.

Performance indicators

G&T has:

- Developed a system for supply chain verification. Since circa February 2016, G&T has evaluated appropriate potential suppliers before they enter the supply chain.
- Been reviewing its existing supply chains periodically.

Training and awareness raising

G&T has in place an online training module introduced in October 2016 which it offers to all staff within the organisation (and appropriate suppliers).

The training covers:

- Examples of modern day slavery
- What does the Modern Slavery Act 2015 mean to individuals?
- What is expected of employees with regards to looking out for and reporting victims of modern day slavery?
- How to identify victims of slavery
- How to report suspected cases of modern day slavery

Board approval

This Statement covers the G&T financial year ending 30 April 2018 and has been approved by G&T's Management Board, which will review and update it annually.

Adam Glover
Designated member

A handwritten signature in black ink that reads "Adam Glover" in a cursive style, with a horizontal line underneath the name and a period at the end.

Richard Bryer
Designated member

A handwritten signature in black ink that reads "R. Bryer" in a cursive style, with a horizontal line underneath the name.

18 February 2019