

MODERN SLAVERY ACT POLICY

Prepared By: Human Resources
Last Revised: 1 January 2018

1.0 INTRODUCTION

Gardiner & Theobald LLP (G&T) provides a wide range of professional construction consultancy and related professional services. As part of the construction industry, G&T recognises that it has a responsibility to take a robust approach to slavery and human trafficking. G&T are absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that their supply chains are free from slavery and human trafficking consistent with disclosure obligations under the Modern Slavery Act 2015.

This policy sets out G&T's actions with regards to potential modern slavery risks related to its business and has put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and that of its supply chains. The policy covers the activities of G&T and applies to all employees working for G&T.

2.0 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. It has corporate subsidiaries, and currently has offices in United Kingdom and the USA.

Professional services are supplied in these countries, and on occasion outside them.

3.0 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 and confirm (where appropriate) that they are prepared to accept and comply with G&T's modern slavery procedures and training programme.

G&T will not use suppliers that have been convicted of any offences under the Modern Slavery Act 2015.

4.0 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 and sub-contractors by G&T, where their work practices may be non-compliant

5.0 RESPONSIBILITY

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

- **Statement :** The modern slavery statement has been drafted by a working party involving 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-contractors, contractors and suppliers
- **Training:** A training programme has been implemented to ensure understanding of modern slavery.

6.0 RELEVANT POLICIES

G&T operates the following relevant policies

- **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 Director confidentially or can make a confidential disclosure directly to the Modern Slavery helpline either by telephone or online at <https://modernslavery.co.uk/report-it.html>
- **Employee code of conduct/Ethics:** G&T comply with the RICS guidelines on ethics and professional standards
- **Recruitment/Agency workers policy:** G&T uses only specified, reputable employment agencies to source staff. All recruitment agencies are subject to due diligence before they are placed on our preferred suppliers list.
- **Corporate Social Responsibility Policy:** The core values of G&T are performance, honesty, uniqueness, dependability, responsibility and quality. Our CSR policy has been amended to include reference to modern slavery and the steps we take have taken.

7.0 DUE DILIGENCE

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

8.0 PERFORMANCE INDICATORS

G&T is:

- Implementing staff training on modern slavery which was introduced in Autumn 2016
- Developing a system for supply chain verification. Since circa February 2016, G&T has evaluated appropriate potential suppliers before they enter the supply chain
- Reviewing its existing supply chains periodically

9.0 TRAINING AND AWARENESS RAISING

G&T will offer all staff within the Firm (and appropriate suppliers) on-line training on modern slavery.

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

Independent Construction and Property Consultancy

Project Leadership | Cost Certainty | Construction Success | Specialist Consultancy

10 South Crescent, London, WC1E 7BD

gardiner.com

GARDINER & THEOBALD LLP

Modern Slavery Act Policy

November/2016