

Modern Slavery and Human Trafficking Statement 2022-2023

Reference: MOD-1.02
Issue No.: 3.00
Security Classification: **PUBLIC**
Issue Date: 13 February 2023
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1. Introduction

- 1.1 This Modern Slavery and Human Trafficking Statement is published in line with section 54(1) of the Modern Slavery Act 2015.
- 1.2 This Statement relates to actions during the financial year 1 April 2022 to 31 March 2023.
- 1.3 This Statement sets down Gleeds' commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Our people are expected to report their concerns and management to act upon them.

2. About Gleeds

- 2.1 Gleeds is an independent multi-disciplined consultancy, providing construction and property-related services to customers operating in both the public and private sectors.
- 2.2 We employ approximately 2,700 employees worldwide and also have people placed with us on temporary basis through employment agencies. Through our work we also engage with numerous suppliers of goods and services.
- 2.3 We operate through several companies, each under the direction of a Chief Executive Officer (CEO) and an Executive Management Board.
- 2.4 Gleeds currently operates in the following countries:

United Kingdom

Ireland (Eire)

Western Europe:

- France
- Germany
- Italy
- Portugal
- Spain

Central Eastern Europe:

- Czech Republic Hungary
- Hungary
- Poland
- Romania
- Slovakia
- Ukraine

Middle East and Africa:

- Egypt
- Qatar
- Kingdom of Saudi Arabia
- United Arab Emirates (UAE)

Asia and Pacific:

- Australia
- China
- Hong Kong
- India
- Singapore
- Vietnam

Americas:

- Peru
- United States

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3. Our commitment to the principles of the Modern Slavery Act 2015

- 3.1 Gleeds is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We acknowledge the role that we can play to help to bring this about.
- 3.2 We are an equal opportunities employer, fully committed to creating and ensuring an inclusive and respectful working environment for all our people. We want all our people to feel confident that they can report concerns without any risk to themselves.
- 3.3 Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK, or abroad, and to safeguard employees from any abuse or coercion.
- 3.4 We recognise that, as a purchaser of goods and services, we have the opportunity to influence good practices in the employment of people by other organisations.
- 3.5 We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.
- 3.6 In addition to publishing our modern slavery statement on our website we will add this to the Home Office modern slavery statement registry.
- 3.7 Here are the steps that Gleeds has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

4. Our supply chain

- 4.1 We procure goods and services from the UK and overseas.
- 4.2 We build relationships with our suppliers to ensure they understand our values and comply with our expectation and commitment to protect human rights and the environment. As part of our procurement processes, we require all of our suppliers to comply with the requirements of the Modern Slavery Act and include appropriate contractual obligations within our commercial agreements.
- 4.3 We require organisations tendering to work with Gleeds to confirm that they have fulfilled their statutory requirement to have produced a Modern Slavery Statement if they meet the criteria to do so.

5. Our policies which relate to the Modern Slavery Act 2015

- 5.1 We have implemented robust policies and procedures to ensure compliance with the Modern Slavery Act 2015. Our key policies are available to all people through the Gleeds' intranet:
 - Modern Slavery and Human Trafficking Policy;
 - Employee Code of Integrity and Business Ethics;
 - Supplier Code of Integrity and Business Ethics;
 - Anti-bribery and Corruption Policy

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- Anti-Money Laundering and Counter Terrorist Financing Policy;
- Whistleblowing Policy;
- Recruitment Policy;
- Equal Opportunities and Diversity Policy;
- Wellbeing Policy;
- Disciplinary Procedure; and
- Procurement Policy.

5.2 These policies set out the standards required of our people and include details of the mechanisms in place which can be used report issues or concerns about Modern Slavery linked to our organisation.

6. Due Diligence

- Through undertaking due diligence in our activity, we seek to ensure that we do not inadvertently support Modern Slavery. We make our processes known to potential employees and suppliers as a means of encouraging good practice.
- We ensure that all employees are legally entitled to work in the UK, or abroad, and that the contract is directly with them.
- We also ensure that any recruitment agency we utilise for the placement of temporary employees follows the same requirements to confirm the identity and right to work of individuals placed with us.
- When we undertake a supplier pre-assessment process under which potential suppliers must self-declare if they meet the relevant criteria in the Modern Slavery Act 2015.
- We also reserve the right to challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
- We follow guidance provided by the Home Office and the National Crime Agency, and other internationally recognised bodies, and undertake reviews of our current Tier 1 supply base to categorise our contracts by assessing these against key modern slavery risk indicators.
- We will further review our supplier onboarding process to embed checks on suppliers to ensure compliance with the requirements of the Modern Slavery Act 2015.

7. Risk Assessment and Management

7.1 The two main areas of risk in relation to modern slavery at Gleeds relate to our contractual arrangements and recruitment of employees. The steps that we will take to manage these risks are outlined in Clause 7.2 and 7.3 below.

7.2 We will ensure that consideration of the modern slavery risks and prevention are added to Gleeds' Procurement Policy review process as an employer and procurer of goods and services.

7.3 We will ensure when undertaking a further review of relevant People policies that they include the consideration and prevention of risks of engagement of people or groups through Modern Slavery.

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8. Training

- 8.1 We will provide mandatory awareness training to all employees on the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of modern slavery or human trafficking.
- 8.2 We will ensure that employees involved in buying or procurement, and the recruitment and deployment of workers, receive training on modern slavery and ethical employment practices.

9. Key Performance Indicators

- 95% of employees will have undertaken mandatory training in relation to modern slavery by 30 September 2023.
- All Tier 1 suppliers % comply with the requirements of the Modern Slavery Act 2015 by 31 December 2023.
- All people policies connected to Modern Slavery to be reviewed and updated by 31 December 2023, with a further review on the language and tone used by April 2024.

10. Contact details

- 10.1 If you suspect modern slavery in the UK, report it to the Modern Slavery Helpline on 08000 121 700 or the police on 101. In an emergency call 999, your information could save a life. Click [here](#) for other National Hotlines.
- 10.2 In addition, our people and external contacts can report any concerns in relation to potential modern slavery linked to the Gleeds' operations to the Group Compliance Director (david.benge@gleeds.com).

Richard Steer



Global Chairman

13 February 2023

Graham Harle



Chief Executive

13 February 2023