gleeds

Modern Slavery and Human Trafficking Statement

For Financial Year

1 January 2020 to 31 December 2020

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1. Introduction

This Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 January 2020 to 31 December 2020.

The 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. Employees are expected to report their concerns and management to act upon them.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

2. Our organisational structure

Gleeds is an independent multi-disciplined consultancy, providing construction and property-related services to customers operating in both the public and private sectors.

This statement covers the business activities of Gleeds which are as follows:

- Programme and Project Management Services
- Commercial and Contract Management Services
- Asset Management Services
- Advisory Services

Gleeds operates through several companies each under the direction of a Chief Executive Officer (CEO) and an Executive Management Board. The CEO, along with other Directors responsible for corporate functions and those from the Executive Management Board, the UK Board and the International Boards, form the Gleeds Executive Management Team.

The Executive Management Board has ultimate responsibility for and sets human rights policy, including that relating to modern slavery and human trafficking, which sits within the Gleeds Management System.

3. Our geographies

Gleeds currently operates in the following countries:

- Americas
  - Caribbean
  - Quito
  - United States
- Asia:
  - Australia
  - Greater China
  - Hong Kong
  - India
  - Singapore
  - Sri Lanka
- Europe:
  - Albania
  - Austria
  - Belgium
  - Czech Republic Hungary
  - France
  - Germany
  - Hungary
  - Poland
  - Portugal
  - Romania
  - Slovakia
  - Spain
  - Ukraine
  - United Kingdom
- Middle East and Africa:
  - Egypt
  - Qatar
  - United Arab Emirates

4. Our supply chain

Gleeds' relationship with its suppliers is an important component in achieving high performance in business. In selecting suppliers, Gleeds works hard to choose reputable business partners who are committed to ethical standards and practices compatible with those of Gleeds.

Types of suppliers that we trade with include architects, civil engineers, structural engineers, building services engineers and other specialist consultants providing construction and/or property related services supplementing those provided by Gleeds. Before engaging suppliers, they are required to complete a pre-qualification questionnaire detailing competence, capability and compliance with statutory and regulatory requirements.

We also recruit employees directly and engage permanent, fixed term and agency workers via recruitment agencies.

5. High risk activities

We have assessed whether our activities and countries in which we operate are high risk in relation to modern slavery. The main risk of modern slavery in our business activities stems from bringing people employed by other companies to support us in delivering services to our customers, particularly agency workers. There are also potential risks in our supply chain in relation to services, principally in our business units outside the European Economic Area (EEA).

Responsibility for Gleeds' anti-slavery initiatives is as follows:

- Policies -The Risk & Compliance Director is responsible for creating and reviewing policies. The process by which policies are developed is by looking at best practice and adapting to the needs of Gleeds.
- Risk assessments - The Risk & Compliance Director is responsible for risk assessments in respect of human rights and modern slavery. A self-assessment questionnaire is used to collect data on human trafficking and modern slavery-related risks, to assess and mitigate risk, and to ensure our compliance with human trafficking and modern slavery related legislation.
- Due diligence - The Risk & Compliance and People Teams are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

6. Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Ethics Policy - Gleeds' policy encourages all its people to maintain a culture of openness, trust and integrity in Gleeds' business activities.
- Whistleblowing Policy - Gleeds encourages all its people, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- Anti-Bribery and Corruption Policy - Sets out Gleeds' responsibilities, and those of our employees and suppliers providing services for us, in observing and upholding our position on bribery and corruption. It provides information and guidance as to how we expect those working for us to conduct themselves and how to recognise and deal with bribery and corruption issues.

- Corporate Social Responsibility (CSR) Policy - Gleeds' CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

As part of our corporate social responsibility programme, we have developed and implemented the following Codes:

- Gleeds Code of Integrity and Business Ethics - This Code communicates the actions and behaviour expected of employees when representing Gleeds.
- Gleeds Supplier Integrity and Business Ethics - This Code communicates our commitments and approach to combat modern slavery and human trafficking; with which we expect our suppliers and business partners to adhere.

7. Due Diligence Processes for Slavery and Human Trafficking

Gleeds undertakes due diligence when considering taking on new suppliers, and we regularly review our existing suppliers. Gleeds due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

We are undertaking activities across our business and with our supply chain to raise awareness of modern slavery, which includes a regular audit of our suppliers. We will also re-evaluate our due diligence check process on suppliers.

8. Performance indicators

Gleeds uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all employees to have completed training on modern slavery by 1 October 2020.

Ref.	KPI Name	Target	Calculation
1.	% Existing employees to have completed training on modern slavery	100% by 1 October 2020	Measures used for calculation: A = Number of people employed by Gleeds at 31 March 2019 having completed training; B = Number of people employed by Gleeds at 1 October 2020 completing training. Calculation formula: (A/B) x 100
2.	% Due diligence checks on existing suppliers regarding slavery and human trafficking	100% by 4 November 2020	Measures used for calculation: A = Number of suppliers on Gleeds Approved Supplier List at 4 November 2020 having undergone due diligence checks; B = Number of suppliers on Gleeds Approved Supplier List at 4 November 2020. Calculation formula: (A/B) x 100

Ref.	KPI Name	Target	Calculation
3.	% Due diligence checks on existing recruitment agencies regarding slavery and human trafficking	100% by 4 November 2020	Measures used for calculation: A = Number of suppliers on recruitment agencies at 4 November 2020 having undergone due diligence checks; B = Number of suppliers on recruitment agencies at 4 November 2020. Calculation formula: (A/B) x 100
4.	% Existing suppliers issued Gleeds' Supplier Code of Conduct	100% by 11 May 2020	Measures used for calculation: A = Number of suppliers on Gleeds Approved Supplier List at 11 May 2020 having been issued Gleeds' Supplier Code of Conduct; B = Number of suppliers on Gleeds Approved Supplier List at 11 May 2020. Calculation formula: (A/B) x 100
5.	% Existing recruitment agencies issued Gleeds Supplier Code of Conduct	100% by 11 May 2020	Measures used for calculation: A = Number of recruitment agencies on Gleeds Approved Supplier List at 11 May 2020 having been issued Gleeds Supplier Code of Conduct. B = Number of recruitment agencies on Gleeds Approved Supplier List at 11 May 2020; Calculation formula: (A/B) x 100

9. Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, Gleeds requires all existing employees to complete an e-learning modern slavery and human trafficking awareness training by 1 October 2020. New employees will be required to complete the training as part of our onboarding process.

The training will promote a company-wide sense of responsibility to prevent modern slavery in both Gleeds and our supply chain; provide examples of red flags for our industry; and explain Gleeds' reporting procedures for suspected cases of modern slavery.

10. Executive Board Approval

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Gleeds' Executive Board of Directors endorses this statement and is fully committed to its implementation. It was approved by the Gleeds' Executive Board on 12 February 2021.

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