

# Modern Slavery and Human Trafficking Statement 2020

Reference: MOD-1.02

Issue No.: 2.00

Security Classification: **PUBLIC**

Issue Date: 1 June 2021

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1. [Introduction](#)
    - 1.1 This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 January 2020 to 31 December 2020.
    - 1.2 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. Staff are expected to report their concerns and management to act upon them.
  2. [Organisational structure and supply chains](#)
    - 2.1 Gleeds is an independent multi-disciplinary consultancy providing construction- and property-related consultancy services to customers operating in both the public and private sectors.
    - 2.2 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.
    - 2.3 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, and the Senior Leadership Teams, form the Gleeds Executive Management Team.

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- 2.4 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.
- 2.5 Gleeds' relationship with its suppliers is an important component in achieving high performance in business. In selecting suppliers, Gleeds works hard to choose reputable suppliers who are committed to ethical standards and practices compatible with those of Gleeds.
- 2.6 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 to supplement those provided by Gleeds to e to provide an all-in service to customers. We also engage suppliers for the provision of products and services, such as stationary, IT equipment providers, software providers, cloud-service providers, cleaners, legal advisers, copywriters, personal protection equipment, maintenance engineers, and document storage/ archiving service providers. In addition, we occasionally engage temporary workers via recruitment agencies.
- 2.5 Before engaging suppliers, they are required to complete a pre-qualification questionnaire detailing competence, capability, and compliance with statutory and regulatory requirements.
- 2.6 From a risk management perspective, we have identified areas we need to develop in conjunction with our supply chain, and a risk-based approach is under development. This approach is to include identifying and reviewing suppliers that fall within industries and/or countries that can carry a higher risk, including in respect of modern slavery and human trafficking. Gleeds is developing an enhanced supplier take-on review and ongoing monitoring process, which will be handled by the Compliance Team.
- 2.7 Gleeds currently operates in the following countries:
- **United Kingdom**
  - **Asia Pacific:**
    - Australia
    - China
    - Hong Kong
    - India
    - Singapore
    - Sri Lanka
  - **Europe:**
    - Albania
    - Austria
    - Belgium
    - Czech Republic Hungary
    - France
    - Germany
    - Poland
  - **Europe (continued):**
    - Portugal
    - Romania
    - Slovakia
    - Spain
    - Ukraine
  - **Middle East and Africa:**
    - Egypt
    - Qatar
    - United Arab Emirates
  - **North America**
    - United States
  - **South America:**
    - Ecuador
    - Peru

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## 3. [High risk activities](#)

We, and the most of our suppliers, are not in industries with a high risk of modern slavery or human trafficking. In addition, our supply chains are primarily confined to the UK and countries with a relatively lower risk of modern slavery or human trafficking.

## 4. [Responsibilities](#)

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

- (1) The Group Compliance Director is responsible for the "Anti-Slavery and Human Trafficking Policy", the annual "Modern Slavery and Human Trafficking Statement", risk assessments in respect of human rights and modern slavery, and for creating and reviewing supplier-related policies regarding human rights and modern slavery;
- (2) The Chief People Officer is responsible for creating and reviewing employee-related policies regarding human rights and modern slavery; and.
- (3) The Compliance Team is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking and conducting regular supplier audits.

## 5. [Training](#)

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, Gleeds required all existing and new employees to complete an on-line training course.

## 6. [Policies](#)

5.1 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.

5.2 In addition to our "Anti-Slavery and Human Trafficking Policy", the following policies and codes 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:

- (1) **Whistleblowing Policy** - Gleeds encourages all its employees, temporary workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains;
- (2) **Employee Code of Integrity and Business Ethics** - The Code sets down the actions and behaviour expected of employees when representing Gleeds;
- (3) **Supplier Code of Integrity and Business Ethics** - The Code requires all our suppliers to adhere to the highest standards of ethics;
- (4) **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;

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- (5) **Anti-Money Laundering and Counter Terrorist Financing 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;
- (6) **Recruitment Policy** – Gleeds uses only specified, reputable employment agencies to source operatives and always verifies the practices of any new agency before accepting workers from that agency;
- (7) **Equal Opportunities and Diversity Policy**; and
- (8) **Wellbeing Policy**.

## 7. [Due diligence processes for slavery and human trafficking](#)

7.1 Gleeds undertakes appropriate due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Gleeds' due diligence process includes:

- (1) The use of a self-assessment questionnaire used to collect data on human trafficking and modern slavery-related risks, to assess and mitigate risk, and to ensure suppliers are complying with human trafficking and modern slavery related legislation; and
- (2) Verifying suppliers comply with legislative requirements relating to modern slavery and human trafficking; and
- (3) Requiring all suppliers to adhere to our "Supplier Code of Integrity and Business Ethics".

7.2 New suppliers that do not conform to our required standards during the take on are rejected.

7.3 Existing suppliers that do not conform to our required standards are given the opportunity to address and resolve the issue, with our support where required.

## 8. [Performance indicators](#)

8.1 We have designed 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:

Ref.	KPI Name	Target(s)	Calculation
1.	% Existing employees to have completed training on modern slavery	80% by 30 December 2021 100% by 1 December 2021	Measures used for calculation: A = Number of people employed by Gleeds on 30 June 2021 having completed training; and B = Total number of people employed by Gleeds at 30 June 2021 completing training.  Calculation formula: (A/B) x 100

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Ref.	KPI Name	Target(s)	Calculation
2.	% Suppliers who confirm that they will conform with Gleeds' "Supplier Code of Integrity and Business Ethics".	100% by 19 November 2021	Measures used for calculation: A = Number of suppliers on Gleeds Approved Supplier List at 19 November 2021 having undergone due diligence checks; and B = Total number of suppliers on Gleeds Approved Supplier List at 19 November 2021. Calculation formula: (A/B) x 100
3.	% Existing suppliers issued Gleeds' Supplier Code of Integrity and Business Ethics	100% by 30 November 2021	Measures used for calculation: A = Number of suppliers on Gleeds Approved Supplier List at 30 November 2021 having been issued Gleeds' Supplier Code of Integrity and Business Ethics; and B = Number of suppliers on Gleeds Approved Supplier List at 30 November 2021. Calculation formula: (A/B) x 100
4.	% Due diligence checks on existing suppliers of sub-consultancy services regarding slavery and human trafficking	80% by 19 November 2021	Measures used for calculation: A = Number of suppliers at 19 November 2021 having undergone due diligence checks; and B = Total number of suppliers at 19 November 2021. Calculation formula: (A/B) x 100
5.	% Due diligence checks on existing suppliers of products and services regarding slavery and human trafficking	60% by 19 November 2021	Measures used for calculation: A = Number of suppliers at 19 November 2021 having undergone due diligence checks; and B = Number of suppliers at 19 November 2021. Calculation formula: (A/B) x 100
6.	Number of reported instances of modern slavery within Gleeds	None	
7.	Number of reported instances of modern slavery within Gleeds' supply chain	None	

8.2 These KPIs will be implemented in 2021.

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## 9. [Incidences of modern slavery](#)

No incidences of modern slavery have been recorded or uncovered within Gleeds or its supply chain in the past 12 months.

## 10. [Looking forward](#)

We recognise the extremely complex nature of modern slavery and will continue to monitor our operational practices, and have identified the following key actions for 2021:

- (1) Complete the MSAT (Modern Slavery Assessment Tool) assessment as part of our learning process; and use the results to inform a Modern Slavery Improvement Plan, which we will follow in order to put in place effective risk mitigation and to better address modern slavery in our supply chains.
- (2) Implement KPIs to regularly measure the performance of our suppliers.
- (3) Conduct regular supplier audits which have a degree of focus on slavery and human trafficking and where general risks are identified.
- (4) Review the mapping of our supply chain to assess product, service and or geographical of modern slavery and human trafficking risks;
- (5) Evaluate the modern slavery and human trafficking risks of each new supplier;
- (6) Review on a regular basis all aspects of our supply chain based on the supply chain mapping; and
- (7) Ensure completion of our Modern Slavery and Human Trafficking Due Diligence Questionnaire by both existing and new suppliers. Suppliers will be required to complete the Questionnaire every three (3) years).

## 11. [Approval](#)

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated, as necessary. The Executive Management Board endorses this statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Richard Steer



Chairman

1 June 2021

Graham Harle



Chief Executive

1 July 2021