

# Modern Slavery and Human Trafficking Statement 2023-2024

Reference: MOD-1.02  
Issue No.: 4.00  
Security Classification: **PUBLIC**  
Issue Date: 16 May 2024  
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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 2023 to 31 March 2024, and Gleeds' improvement plans for 2024.
- 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 Who we are

- **Introduction:** Gleeds is a global consultancy firm providing construction- and property-related consultancy services to clients in both the private and public sectors.
- **Our people:** We have approximately 2,700 employees worldwide, and we also work with temporary people through various employment agencies. We interact with many suppliers to source the services and goods needed for our operations.
- **Our structure:** Gleeds is structured into various partnerships, limited companies, and other entities, all directed by a Chief Executive Officer (CEO), Chief Operating Officer (COO) and supported by a global Operations Board and regional leadership teams.

### 2.2 Where we operate

We operate in various countries, ensuring a wide global reach, which are as follows:

#### United Kingdom

#### Ireland (Eire)

#### Western Europe:

- France
- Germany
- Italy
- Portugal
- Spain

#### Central Eastern Europe:

- Czech Republic
- Hungary
- Italy
- 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

- **Full support:** Gleeds is fully committed to supporting the Modern Slavery Act 2015 and actively opposes modern slavery and human trafficking. We understand the significant role we can play in eliminating these practices.
- **Equal opportunity employer:** We are an equal opportunity employer that fosters an inclusive and respectful working environment. We encourage all employees to report their concerns without fear of retaliation.
- **Legal compliance:** Our recruitment and management processes are designed to confirm that every employee is legally allowed to work in the country in which they are located, ensuring protection from exploitation and coercion.
- **Business practices:** We refuse to conduct business with any organisation, domestic or international, that knowingly supports or is involved in slavery, servitude, or forced labour.

## 4. Supply chain management

- **Global procurement:** We source goods and services from both UK-based and international suppliers.
- **Building relationships:** 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.
- **Contractual obligations:** We require all suppliers to follow the Modern Slavery Act and ensure that their contracts include strict rules against modern slavery.
- **Tender confirmation:** Suppliers bidding for contracts with Gleeds must confirm their compliance with the Modern Slavery Act if they are required by law to publish a modern slavery statement.

## 5. Related company policies

The following policies are accessible to all our employees on Gleeds' intranet:

- **Modern Slavery and Human Trafficking Policy:** Describes Gleeds' commitment to identifying, preventing, and addressing modern slavery and human trafficking, both within its own operations and in its supply chain.
- **Employee Code of Integrity and Business Ethics:** Outlines the behavioural standards expected of all employees.
- **Recruitment Policy:** Ensures fair and transparent hiring practices.
- **Equal Opportunities and Diversity Policy:** Promotes an inclusive workplace by ensuring that all employees and applicants receive fair treatment, free from discrimination based on characteristics like race, gender, disability, or age.
- **Wellbeing Policy:** Establishes guidelines to support the physical and mental health of employees, encouraging a healthy work-life balance and providing resources for managing stress and workplace issues.

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- **Whistleblowing:** Provides a mechanism for reporting unethical behaviour without fear of retaliation.
- **Disciplinary Procedure:** Comprises the procedures for handling employee misconduct.
- **Procurement Policy:** Guides ethical procurement practices.
- **Supplier Code of Integrity and Business Ethics:** Outlines the behavioural standards expected of all our supplier's employees.
- **Anti-bribery and Corruption Policy:** Details Gleeds' stance on preventing bribery and corruption, emphasising compliance with relevant laws, and setting clear expectations for employee conduct.
- **Anti-Money Laundering and Counter Terrorist Financing Policy:** Sets out procedures for detecting and preventing money laundering and terrorist financing activities within the business, complying with legal obligations and international standards.

## 6. Due diligence practices

- **Ensuring compliance:** We conduct thorough due diligence in all our activities to avoid inadvertently supporting modern slavery. We make our expectations known to employees and suppliers to encourage best practices.
- **Legally entitled to work:** We verify that all employees are legally entitled to work in the country located and that their contracts are with them directly.
- **Agency oversight:** We ensure that recruitment agencies confirm the identity and work eligibility of temporary people before placing them with us.
- **Procurement process:** Potential suppliers are required to declare if they meet specific conditions outlined in the Modern Slavery Act.
- **Low-cost tenders:** We reserve the right to challenge any suspiciously low-cost tenders to confirm they don't rely on forced labour.
- **Supplier assurance:** We use Supplier Assurance Questionnaires and an Approved Supplier List to ensure ethical practices among suppliers.
- **Supplier onboarding:** Our onboarding process includes checks to confirm compliance with the Modern Slavery Act.

## 7. Risk assessment and management

- **Key risk areas:** Our main risk areas are contracts and recruitment. We will take the following steps to manage these risks:
  - **Procurement Policy:** Incorporate modern slavery prevention into our Procurement Policy as a responsible employer and purchaser.
  - **People Policies:** Review people-related policies to identify and prevent risks related to modern slavery.

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## 8. Training and awareness

- **Mandatory training:** We will offer mandatory training on the Modern Slavery Act to all our people, guiding them on the correct steps if they suspect modern slavery or human trafficking.
- **Specific training:** People involved in buying, procurement, recruitment, and worker management will receive bespoke training in modern slavery and ethical practices.

## 9. Key performance indicators

- **Training targets:** At least 95% of people will have completed mandatory training on modern slavery by 30 September 2024.
- **Policy review:** All people policies will be reviewed and updated by 31 December 2024, focusing on language and tone.

## 10. Contact information

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

Richard Steer



Global Chairman

16 May 2024

Graham Harle



Chief Executive

16 May 2024