

CUNDALL

STATEMENT

# Modern Slavery and Human Trafficking

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<b>Project Name:</b>	<b>HR Policy and Procedure</b>
<b>Client:</b>	Cundall
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**Document Revision History**

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A	18/01/2021	Update for 2020/21 Financial Year

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19/01/2021

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Carole O'Neil  
 Principal Author  
 Signed by: O'Neil, Carole


20/01/2021

**X** Samantha Hammond Opelt

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Samantha Hammond Opelt  
 Checked By  
 Signed by: Hammond Opelt, Samantha

20/01/2021

**X** 

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Tomas Neeson  
 Verified By  
 Signed by: Neeson, Tomas

# 1. Modern Slavery and Human Trafficking Statement

## 1.1 Introduction

This statement sets out the actions that Cundall Johnston and Partners LLP, Cundall Limited and their subsidiary companies ("Cundall") will take to prevent modern slavery and human trafficking risks in its own business(es) and its supply chain(s) in accordance with Section 54 of the Modern Slavery Act 2015 ("the Act").

This statement was reviewed in January 2021 and relates to actions and activities during the financial year(s) commencing 1 July 2020 and 1 July 2021, and will be reviewed as necessary.

## 1.2 Statement of Commitment

As part of its work in the construction and engineering sector, Cundall recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking.

Cundall is absolutely committed to preventing modern slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from modern slavery and human trafficking.

## 1.3 Organisational structure and supply chains

Cundall delivers multi-disciplinary consultancy services in the built environment sector.

As a professional services business engaged in the delivery of consultancy services, Cundall's work is delivered by staff who are employed directly by the business, or by suppliers who are engaged by Cundall to deliver sub consultancy services. Cundall's external supply chain is made up primarily of suppliers who supply office consumables, and the providers of professional services such as legal, financial and recruitment services.

Cundall currently operates in the following regions:

- United Kingdom and Ireland
- Europe
- Middle East
- Asia
- Australia

Cundall assesses whether or not particular activities or countries are high risk in relation modern slavery or human trafficking by reference to the following key criteria:

- Press reports
- The existence (or otherwise) of legislation or regulation relating to the supply of labour in the market
- Custom and practice amongst suppliers

### 1.3.1 Higher-risk activities

Cundall considers that the majority of its activities are low risk in relation to modern slavery or human trafficking. However, the following activities are considered to be those which may present a higher risk in this regard:

Projects where Cundall works as part of a team with a contractor (particularly in locations outside the UK) to deliver a project, and where that contractor may adopt labour practices which do not conform with Cundall's own standards. To mitigate this risk, Cundall has shared with its global workforce the UK government's fact-sheet on Modern Slavery, through this link (internal use only).

### 1.3.2 Responsibility

Responsibility for Cundall's anti-slavery initiatives is as follows:-

#### Policies

Cundall's Human Resources team is responsible for preparing draft policies, in consultation with managers across the organisation. Draft policies are reviewed by Cundall's Legal Department, and signed off by Cundall's Management Board.

Policies are reviewed (at least) annually, on the anniversary of the date on which the policy was first approved.

#### Risk Assessments

Risk assessments in relation to particular activities are undertaken by the Partner (or other senior manager) with overall responsibility for that area of activity. For instance:-

- Risk assessments in relation to project-related activities are the responsibility of the individual Project Director;
- Risk assessments in relation to employment practices are the responsibility of the Human Resources and Training Partner;

- Risk assessments in relation to supply chain activities are the responsibility of the Finance Partner;
- Risk assessments in relation to general business activities not falling within the specific remit of an individual Partner (or other senior manager) are the responsibility of the Legal Director.

### Investigations / Due Diligence

Where instances of modern slavery and/or human trafficking are known or suspected, an initial investigation will be carried out by the Partner (or other senior manager) with responsibility for the business area or the geographic region in which the activity is suspected to have taken place, with support from other functions within the business as required. Investigations may include (amongst other things) some or all of the following:-

- A review of documentation relevant to the suspected activity;
- Interviews with staff members involved in the suspected activity;
- Interviews with clients or suppliers involved in the suspected activity.

### Communication

This statement is communicated to all permanent, temporary and contract staff employed by Cundall as part of the standard induction process.

This statement is communicated to clients and suppliers via Cundall's website, and is referenced in standard form supplier contracts.

## 1.4 Relevant Policies

Cundall operates the following policies which are relevant to the identification of modern slavery risks, and which serve to minimise the risk of modern slavery and human trafficking in its operations.

### 1.4.1 Disciplinary Policy

Cundall's disciplinary procedures make clear to employees the actions and behaviours expected of them in the course of their employment or engagement. Cundall strives to maintain the highest standard of employee conduct and ethical behaviour when operating in all of its geographical locations, and when managing its supply chain.

### 1.4.2 Ethical Business Policy

Cundall's Ethical Business Policy makes clear its commitment to ethical business in all of the geographical locations in which it operates, irrespective of local customs or practices.

### 1.4.3 Recruitment and Selection Policy

Cundall uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency prior to accepting introductions from that agency. Expectations of employment agencies are clearly stated in Cundall's standard terms of business, to which all new agencies are required to subscribe.

## 1.5 Due diligence

Cundall's due diligence and reviews include:-

- Broad mapping of its supply chain to assess particular product or geographical risks of modern slavery and human trafficking;
- Participating in collaborative initiatives focused on human rights in general, and modern slavery and human trafficking in particular, for instance through the work of our "Sustainability Teams" in each office, who have driven the procurement of "Fair Trade" produce for a variety of business activities; and
- Invoking sanctions against suppliers who violate our policies on ethical business (including the principles set out in this statement), including the termination of the business relationship.

Cundall's standard fee proposals includes a statement which expressly entitles Cundall to terminate appointments with its clients with immediate effect if it becomes aware of any activity by the client, its affiliates or representatives which contravenes the Modern Slavery Act 2015.

## 1.6 Performance indicators

Cundall has introduced some specific key performance indicators (KPIs) to support compliance with the Modern Slavery Act 2015. These are as follows:-

- Disseminating its Ethical Business Policy to all staff as part of their induction programme upon joining the business;

- Requiring all staff with responsibility for procurement to undertake formal training on issues pertaining to modern slavery and human trafficking on an ongoing basis as required. Any such training needs are identified through the formal staff appraisal process, and actioned by Cundall's Learning & Development team.

### 1.7 Training and Awareness Raising

Cundall has raised awareness of modern slavery issues by disseminating this statement through emails to staff and news items on its intranet, as well as through induction materials for new staff.

Through this statement, staff are signposted to relevant resources, including:

- this video from the Gangmasters and Labour Abuse Authority
- this introductory video from Stronger Together
- this informational video about the Construction Protocol

In addition, staff with specific responsibility for procurement will participate in additional training as required, as described above.

### 1.8 Reporting

If modern slavery or human trafficking is suspected, this must be reported to the relevant Partner(s) as described in this policy.

Cundall also encourages its staff to raise any concerns with the Modern Slavery Helpline, or the Gangmasters and Labour Abuse Authority.

### 1.9 Board Approval

This statement has been approved by Cundall's Management Board, who will review and update it as required.

**Managing Partner's signature:**



**Managing Partner's name:**

Tomás Neeson

**Date:** 18 January 2021

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