

	<b>Modern Slavery &amp; Human Trafficking Policy Statement</b>	Ref	<b>CPS-31</b>
		Issue Date	<b>Jan 2022</b>
		Revision	<b>04</b>
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All Gardner & Co group companies rely upon this statement, where necessary, for the purpose of complying with their individual annual reporting requirements of the Modern Slavery Act 2015. The approach and processes referred to within the statement are relevant to all group companies and Gardner & Co will monitor their performance in complying with its requirements and produce an update in subsequent annual statements. This aim of this policy statement is to communicate our responsibilities and highlight the risks that modern slavery and trafficking pose to our business, clients and supply chain. Integrity is one of the core values under which Gardner & Co operates. Gardner & Co is committed to being a responsible business and to upholding high ethical standards in all our operations, including those of our supply chains, around the world. The Global Slavery Index presents significant evidence that highlights the risk that labour standards issues could be present in construction and property supply chains, in the production of construction materials, delivery of construction activities and through the provision of professional services equipment such as laptops and phones. To identify and mitigate the risks of slavery and human trafficking, Gardner & Co takes the following focussed approach to the procurement of labour, goods and services:


- Identification of issues and risks
- Collaboration with our clients, peers and suppliers
- Clear definition and contractual communication of our expectations
- Review and assessment of supplier compliance
- The resolution of challenges through training and supplier development.

Gardner & Co uses Achilles Building Confidence and other prequalification tools to assess compliance of contractors and suppliers based in the UK. We also undertake further due diligence of suppliers using the Supplier Ethical Data Exchange (SEDEX). These tools assess suppliers against labour standards, health and safety, environmental and business ethics criteria, identifying issues and risks. Where issues are identified, Gardner & Co works with suppliers to seek resolution through training and development. If the issue is deemed serious and/or is not capable of remediation Gardner & Co will remove the supplier from our supply chain unless and until the issue is fully resolved. We recognise that certain jurisdictions are considered high risk and have different legal and cultural frameworks. We work with clients and suppliers to understand the risks and mitigate them within the parameters of local law. We deliver compulsory training for Gardner & Co staff and supply chain leadership teams on the risks of slave labour and human trafficking and how to spot the signs of any potential issues. Gardner & Co also provides specialist guidance to project procurement teams where there are deemed to be significant risks. In further support of this, we have developed guidance on modern slavery and trafficking in two key areas of activity:

1. Procurement of materials and services
2. Supervision of operatives/workers.

Where staff, have concerns around issues of forced labour, human rights, recruitment practices or exploitation, they are encouraged and expected to report concerns to management. All reports will be investigated by the company Assurance Director. Where Gardner & Co acts in an advisory capacity, we advise our clients of the requirements of the Modern Slavery Act 2015 and provide relevant guidance on the associated risks that modern slavery in their supply chains may bring. We will continue to review and, evolve our approach as we gain further understanding of the risks presented by our business activities and suppliers and in line with guidance published by the UK Government. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Gardner & Co's slavery and human trafficking statement for the financial year ending 31 December 2015. This policy statement sets out the approach Gardner & Co Group and its subsidiaries has taken and intends to take, over the next financial year (2018) with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chain.

We have now joined with Stronger2gether to help present a united front in the fight against modern slavery in construction and our supply chains.



Richard Legge

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Managing Director Gardner & Co (Kent) Ltd  
4<sup>th</sup> January 2022