

GRIMSHAW

SM 530 Anti-Slavery & Human Trafficking Policy

Human Resources

INTRODUCTION

This policy deals with the specific issues associated with modern slavery and human trafficking. Modern slavery is a crime and a violation of an individual's fundamental human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. These acts all involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Grimshaw has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the Practice.

POLICY

Grimshaw is committed to ensuring a transparent approach is taken to tackling modern slavery throughout the supply chain:

- Grimshaw expect the same high standards from all of contractors, suppliers and other business partners, and as part of the contracting processes, will include specific prohibitions concerning modern slavery, whether of adults or children, and expect all suppliers to hold their own suppliers to the same high standards.
- Grimshaw aims to work with the supply chain partners to improve performance standards but ultimately may have to review whether on-going relations can continue if appropriate standards cannot be met.

WHO DOES THIS POLICY APPLY TO?

This policy applies to all Grimshaw employees, agents, contractors and other third parties acting on the Practice's behalf.

This policy does not form any part of any employee's contract of employment and may be amended at any time.

RESPONSIBILITY

The Partners have overall responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and putting in place appropriate systems to monitor, train and combat Modern Slavery, where it is appropriate.

COMPLIANCE

All employees, agents, contractors and third parties acting on Grimshaw's behalf must read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the Practice or supply chain is everyone's responsibility.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are expected to report as soon as possible:

- whether you know or suspect any instance of modern slavery is occurring in any part of the Practice or supply chains; and
- whether you know or suspect a breach of this policy is/has occurred to a Partner or if you don't feel comfortable doing this for any reason, in accordance with our Whistleblowing Policy

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within the Practice or any of our supply chains constitutes any of the various forms of modern slavery, raise it with a Partner immediately.

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Grimshaw aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Practice is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be, taking place in any part of the Practice or supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

COMMUNICATION

Training on this policy and on the risks Grimshaw faces from modern slavery in its supply chains will be provided as necessary.

The Practice's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate on an ongoing basis.

NON-COMPLIANCE

Non-compliance with this policy by employees may result in disciplinary action up to and including summary dismissal, and by contractors, agents or other third parties working on our behalf, in termination of contract.

FURTHER INFORMATION

If you have any queries regarding this policy please contact any Partner of the practice.