

POLICY STATEMENT

Modern Slavery and Human Trafficking

Modern Slavery and Human Trafficking Statement

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1	01/12/2025	Changed to the new policy template and new revision system. Updated introduction, statement, responsibilities and code of conduct sections.

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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 November 2025 and relates to actions and activities during the financial year(s) commencing 1 July 2025 and 1 July 2026 and will be reviewed as necessary.

1.1 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 human rights, modern slavery and human trafficking.

Cundall is committed to upholding and respecting all human rights. This refers to international human rights standards including, but not limited to, the Universal Declaration of Human Rights (UDHR).

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.

1.1.1 Freedom of Association

At Cundall, we are committed to upholding the highest standards of human rights, including the right to freedom of association. We believe that all employees have the right to form and join associations of their choice without fear of reprisal. We are dedicated to fostering an inclusive and supportive environment across all our office locations in line with international human rights standards and local legislation.

1.2 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 countries:

- 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

1.2.1 Higher-risk activities

Cundall considers that most of its activities are low risk in relation to modern slavery or human trafficking. However, the following activities are 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 FAQ sheet on Modern Slavery, through this [link](#).

2. Definitions

2.1 Modern Slavery

Modern slavery refers to situations of exploitation in which a person cannot refuse or leave work because of threats, violence, coercion, deception, or abuse of power. It includes forced labour, servitude, slavery, and slavery-like practices.

2.2 Human Trafficking

The recruitment, transportation, transfer, harbouring, or receipt of persons—by means such as threat, use of force, coercion, abduction, fraud, or deception—for the purpose of exploitation. Exploitation includes forced labour, sexual exploitation, domestic servitude, and other forms of abuse.

2.3 Forced Labour

All work or service exacted from any person under the threat of penalty and for which the person has not offered themselves voluntarily. This includes practices such as debt bondage or withholding identity documents.

2.4 Servitude

A situation in which a person is significantly deprived of their liberty and is obliged to live on another person's property and work for them.

2.5 Supply Chain

The network of suppliers, contractors, consultants, agencies, and other third-party organisations that provide goods or services to Cundall, including those delivering office consumables, professional services, and sub-consultancy services.

2.6 High-Risk Activities

Activities, locations, or circumstances where the potential for modern slavery or human trafficking is elevated. For Cundall, this may include project delivery in certain international locations where labour standards or enforcement mechanisms are weaker.

2.7 Partner / Senior Manager

Any individual within Cundall who holds overall responsibility for a specific area of activity or business function, including Partners, Directors, and other senior leaders referenced in this Statement.

2.8 Due Diligence

The processes and assessments undertaken by Cundall to identify, prevent, and mitigate the risks of modern slavery and human trafficking within its operations and supply chain.

2.9 Investigation

A formal inquiry into suspected or actual instances of modern slavery or human trafficking, conducted by the responsible Partner or senior manager with support from relevant internal functions.

2.10 Freedom of Association

The right of employees to freely form, join, or participate in trade unions or other associations without fear of discrimination, retaliation, or adverse treatment.

2.11 Key Performance Indicators (KPIs)

Quantifiable measures used by Cundall to monitor compliance with modern slavery requirements, including training completion and policy dissemination.

2.12 Modern Slavery Act 2015

The legislation enacted by the UK Government to consolidate offences related to slavery and trafficking, and to require certain organisations to publish a modern slavery and human trafficking statement annually.

3. Roles and Responsibilities

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

3.1 Policies

Cundall's ESG and 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.

3.2 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.

3.3 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.

3.4 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.

4. Policy

4.1 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.

4.1.1 Disciplinary policies

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.

4.1.2 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.

4.1.3 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.

4.1.4 Supplier Code of Conduct

Our Supplier Code of Conduct reflects our commitment to ethical business practices, sustainability, and corporate responsibility. It sets clear expectations for our suppliers, including that suppliers respect and promote human rights, ensure fair labour practices, prohibit forced labour and child labour and provide a safe and healthy working environment. Our Supplier Code of Conduct applies to all suppliers, contractors, consultants, and other business partners who provide goods or services to Cundall and our affiliates.

4.2 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.

4.3 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.

4.4 Training

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.

5. Compliance and Monitoring

5.1 Monitoring and continuous improvement

Cundall is committed to continuously improving our efforts to prevent modern slavery and human trafficking. We regularly review our policies, supplier practices, and risk management processes to ensure they remain effective and aligned with evolving standards. Through audits, feedback, and collaboration with stakeholders, we strengthen our approach and promote ethical practices across our operations and supply chains.

5.2 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.

5.2.1 Board approval

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

