

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made on behalf of Cluttons LLP pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement.

Cluttons LLP is a limited liability partnership registered in England and Wales (registered number OC344742). Cluttons LLP is the parent company of a number of Cluttons subsidiaries and provides property consultancy and agency services in the UK. The firm's regulator is the RICS.

Cluttons Investment Management (UK) LLP, a wholly owned subsidiary of Cluttons LLP is authorised and regulated by the Financial Conduct Authority (FCA).

## Our approach

As a professional advisory firm, we always work to the highest professional standards and comply with all laws and regulations applicable to our business. We expect the same high standards from those parties we engage with and we are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or within any part of our operations. A copy of our Anti-Slavery Policy can also be found on the firm's website.

Our Governance & Risk Committee works in conjunction with our Support Functions to ensure that our Anti-Slavery Policy is complied with and to manage any concerns or breaches. We also have a Whistleblowing Procedure which is published on the firm's intranet.

## Supplier due diligence

Our procurement process includes the verification of every new supplier's compliance programme. All our suppliers are expected to comply with all laws and regulations and we request information concerning, amongst other things, health & safety, environmental, equality, anti-corruption and insurance protection. Supplier responses are verified, and we revert to the supplier in the event of ambiguity or non-compliance.

## Improvements and monitoring

We are reviewing our supply chain protocols and introducing specific measures to ensure that our obligations under the Act are passed through our supply chain.

These include our efforts to:

- Obtain contractual warranties in new engagements which describe that no slavery is used anywhere in the supplier's business or by any of the suppliers in its own supply chain and that all necessary policies and processes have been implemented to ensure that this continues to be the case;
- Obtain a contractual right to request compliance-related information and the right to second party audit of suppliers at our discretion;
- Add indemnity provisions and rights to terminate engagements in the event of breach of our Anti-Slavery Policy;
- Ensure risk areas are documented, monitored and taken into consideration in any future contract renewals;
- Train staff on the impact of the Act.

Signed



Managing Partner

Date September 2019