

HR_Employment_Modern Slavery / Human Trafficking Policy

The presence of slavery and forced labour in the operations and supply chains of many businesses internationally and in the UK is a serious problem.

The Modern Slavery Act 2015 requires businesses to report on what they are doing to address slavery. The law provides clarity to businesses and prevents good practise from being undermined by less responsible companies.

Section 54 of the Act 'Transparency in Supply Chains' (TISC) requires every organisation carrying out business in the UK to produce a slavery and human trafficking statement for each financial year. This is required if turnover is over £36m.

ADP Architecture Ltd has decided that it would be good policy to demonstrate our transparency, open communications and approach to human rights due diligence. It is important that all businesses consider whether they may be contributing to such abuses and take appropriate action.

Modern slavery is a grave violation of human rights that affects people almost everywhere including the UK. The ILO (International Labour Organisation) estimates there are 21 million people in forced labour across the world.

For further information, please follow this [link](#).

If you have any concerns about modern slavery or human trafficking, please report them.

Our statement

This statement sets out ADP Architecture Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2016 to 31 March 2017.

As part of the design/construction industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

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

- » ADP Architecture Ltd, is an architectural practice providing professional architectural services, including landscape architecture, interiors, heritage and sustainability. We provide design services to many sectors but predominately, education, (schools,

universities and colleges) health, commercial and mixed use.

- » ADP Architecture Ltd operates in the UK only - with our subsidiary company ADP Building Consultancy Pvt. Ltd operating in India.
- » The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking
- » Our operations are design focussed and any suppliers we use provide professional services/advice or materials used in the activities we undertake.
- » We do not believe that we undertake any high risk activities as an organisation.

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

- » The HR Director is responsible for putting in place and reviewing policies.
- » Risk assessments: All our service suppliers provide professional services/advice and their employees are in receipt of in excess of the minimum wage. As an organisation we assess all employees in terms of their immigration/right to work in the UK, as do our suppliers.
- » We map our limited supply chain to ensure that we can identify where there may be risk and exposure to modern slavery, and we review our supplier contracts to ensure that they comply with the UK Modern Slavery Act.
- » Investigations/due diligence: If there is any suspicion of modern slavery from any area of our supply chain to the Company, it is reported to the HR Director.
- » The HR Director has undertaken specific training and is responsible for cascading this information down within the practice to all those in management positions.

Continued.

HR_Employment_Modern Slavery Policy

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- » Whistleblowing policy: ADP Architecture Ltd encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, clients or others who have concerns can use our confidential disclosure form.
- » Employee code of conduct: the organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. ADP Architecture Ltd strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- » Professional services suppliers code of conduct: ADP Architecture Ltd is committed to ensuring that its suppliers adhere to the highest standards of ethics.
- » Recruitment policy: ADP Architecture Ltd only uses specified, reputable employment agencies to source employees in a professional capacity.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and review maps the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is undertaking a review of its existing supply chain. This is expected to be complete at the end of 2017.

Training

The organisation requires HR professionals within the organisation to complete training on modern slavery.

The organisation's modern slavery training includes:

- » How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- » How to identify the signs of slavery and human trafficking;
- » What initial steps should be taken if slavery or human trafficking is suspected.

Awareness raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting an article on the Company intranet, the Hub, which is accessible to all employees directly from their workstation.

The Hub article will explain to staff the basic principles of the Modern Slavery Act 2015.

This statement has been approved by the organisation's board of directors of ADP Architecture Ltd., who will review and update it annually.



Alison McKerracher, Director.
February 2017