

MODERN SLAVERY POLICY

MODERN SLAVERY ACT 2015 TRANSPARENCY STATEMENT

Carlton provides a wide range of professional and facilities services. This statement sets out the actions taken by Carlton to comply with the Modern Slavery Act 2015. It was approved by the Board of Carlton on 1st June 2018.

Organisational structure, countries of operations and supply chains

Carlton is a limited liability company registered at Companies House under the number 10889803 and is headquartered in London.

Process

Organisations that provide goods or services to Carlton are subject to appropriate due diligence. They are required to confirm that they and their own supply chains are free from human trafficking and slavery.

High-Risk Activities

The following activities are considered by Carlton to carry the risk of modern slavery; the list will be reviewed and updated from time to time:

- Provision of materials supplied to Carlton (such as marketing materials) which may be produced in jurisdictions or by organisations that are not compliant with UK legislation
- Use of staff by suppliers to Carlton where the suppliers' processes may be non-compliant
- Employment of sub consultants, suppliers and sub-contractors by Carlton where their work practices may be non-compliant

Responsibility

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

- Statement: The Modern Slavery statement has been drafted by key personnel and has been approved by the Board
- Investigations/due diligence: Carlton has included specific questions in its due diligence enquiries for new and existing sub-consultants, contractors and suppliers
- Training: A training programme is being developed to ensure understanding of modern slavery. The training resource will be available to all members of the Carlton group both in the UK and overseas and, where necessary, to appropriate consultants, suppliers and contractors
- Right to Work: Carlton uses NSL Limited (PO Box 54188, London W5 1UY) to complete Keesing applications to verify the validity of staff identification documents and to establish the legal right to work

Relevant Policies

Carlton operates the following relevant policies:

- Modern Slavery policy: Carlton has introduced a modern slavery policy setting out its commitment to prevent modern slavery within its corporate activities
- Whistleblowing policy: Carlton’s policy encourages reporting of any concerns relating to the direct activities or the supply chains of Carlton. It is designed to make it easy for all staff to make disclosures without fear of retaliation. Employees, subcontractors, clients or others who have concerns can contact the Managing Partner or the HR Director confidentially or can make a confidential disclosure
- Employee code of conduct/ethics policy: Carlton’s code sets out the actions and behaviour expected of staff when representing Carlton and mirrors the RICS ethics code
- Recruitment/Agency workers policy: Carlton uses specified, reputable employment agencies to source staff
- Corporate Social Responsibility policy: Carlton’s core values are performance, honesty, uniqueness, dependability, responsibility and quality. Our CSR policy has been amended to include specific reference to modern slavery

Due Diligence

CARLTON undertakes appropriate due diligence with new suppliers, and regularly reviews its existing suppliers

Performance Indicators

Carlton is:

- Developing a system for supply chain verification. Since circa February 2016, CARLTON has evaluated appropriate potential suppliers before they enter the supply chain
- Reviewing its existing supply chains periodically

Staff training covers:

- Examples of modern day slavery
- What the Modern Slavery Act 2015 means to individuals
- What is expected of employees with regards to looking out for, and reporting victims of modern day slavery
- How to identify victims of slavery
- How to report suspected cases of modern day slavery

Training and Awareness Raising

Carlton has assessed an online training module which it proposes to offer to all staff within the organisation (and appropriate suppliers).

Version Control and Summary of Changes

| Version Number | Date | Comments (description change and amendments) |
|----------------|-------------|---|
| 1 | 1 June 2018 | New policy |