

## Modern Slavery Policy

June 2020

### ABOUT THIS POLICY

We are all committed to conducting our business in a socially responsible way. Our businesses seek to carry out their operations in accordance with appropriate ethical standards and be honest and fair in their relationships with customers and suppliers. As part of this, we are dedicated to ensuring that effective systems and controls are in place to safeguard against modern slavery and human trafficking occurring within our businesses or any of our supply chain.

### THE COMPANY SLAVERY AND HUMAN TRAFFICKING STATEMENT

In accordance with the Modern Slavery Act 2015 (“Act”), We have published this statement on behalf of its relevant subsidiary companies (“THE COMPANY”). This statement sets the steps that members of The Company have taken during the financial year ending 31<sup>st</sup> March 2020 to prevent modern slavery and human trafficking from occurring within its business and supply chains. The initiatives included in this statement will continue to be implemented during 2020 and will be reported on during 2021.

### **Our Businesses**

Through its subsidiaries we are a leading provider of property services to its key customer groups:

- Services provided to consumers include financial services (mortgage brokerage and protection and general insurance brokerage services) and surveying services (building survey reports, home buyer survey reports and Homescore reports).
- Services provided to mortgage lenders include valuation and panel management services.
- Services provided to mortgage brokers include mortgage network services for appointed representatives and directly authorised firms and software distribution.
- Services provided to The Company Property Partners franchisees include compliance and business advice and provision of procured services such as professional indemnity insurance, software licences and marketing material.

Our financial reporting includes three divisions:

- Surveying
- Mortgage Services
- Group

As at 31<sup>st</sup> January 2020, through its subsidiaries employed circa 320 people across the UK, where its business operations are entirely based.

## **Our Supply Chains**

Members of The Company have established direct relationships with a number of primarily UK-based suppliers who deliver a variety of services including professional services, utilities and telecoms, and facilities management. As part of its service delivery, members of The Company procure services not just for themselves, but also for the benefit of some of the customers of other group companies.

The vast majority of services are procured via specialist individuals employed or engaged by members of The Company.

## **Our Group Policies and Contractual Provisions**

The approach of members of The Company to the promotion of human rights and ethical issues is contained within HR Policies which include but not limited to:

- Anti-Bribery and Corruption Policy
- Equal Opportunities Policy
- Recruitment Policy
- Whistleblowing Policy
- Grievance Policy
- Anti-Bullying and Harassment Policy

The HR policies apply to all individuals employed or engaged by Us and our subsidiaries. Employees can use the whistleblowing policy to report suspected concerns within the Our businesses and supply chains.

Since the enactment of the Act members of The Company have taken steps to seek to ensure that any new agreements with suppliers include an express obligation for suppliers to comply with the Act, to implement due diligence procedures within its own supply chains and notify Us in the event of any actual or potential incidence of modern slavery (for instance, when contractors sign up with Us they agree to terms which require them to comply with the Act). In the event of a breach of these provisions, members of The Company will seek to resolve any issues with its suppliers, and it may also seek to terminate the relationship with the supplier where a resolution is not achieved. This provision is regularly reviewed, and relevant amendments made.

## **The Company Due Diligence**

Members of The Company have identified our supply chains as the main area of risk and exposure to modern slavery.

The suppliers used by The Company have been identified as low risk. The suppliers which provide manufactured goods to Us are very few, limited to marketing providers (providing posters etc), facilities providers (providing toiletries etc) and food and drink suppliers (a local catering company and Tesco). Other suppliers to The Company mainly provide in-person services, such as maintenance services and recruitment services.

## THE COMPANY Group Areas of Risk

Overall exposure to modern slavery for members of The Company is lower than other sectors given the nature of the property services sector in which our businesses operate, the types of services we procure and the fact that our business operations and those of the majority of our suppliers are primarily based in the UK.

Notwithstanding the above, The Company is not complacent and understands that the procurement of recruitment and facilities services and the use of subcontractors are practices which may bring about increased risks of modern slavery within supply chains.

Accordingly, we are taking steps to mitigate such risks, including:

- Requiring suppliers to implement due diligence procedures for its own suppliers and subcontractors
- Having in place stringent checks on our recruitment agencies and ensuring our own internal recruitment processes meet the minimum legal requirement

As part of this, The Company complies with all relevant legislation including the Immigration, Asylum and Nationality Act 2006 and ensures that all appropriate checks are carried out to maintain compliance.

If further risks are identified, The Company will consider such risks and take appropriate steps to address any emerging risks.

## Our Training

The Company understand the importance of training employees to enable them to be able to identify risks of modern slavery. The Company employees receive information that allows them to understand the requirements under the Act in the form of this policy. They also receive our whistleblowing policy, which would allow them to raise concerns anonymously.

## KPI Monitoring

The Board appreciates that the approach to combatting modern slavery will have to adapt over time in response to findings following the completion of various risk assessments.

The Board intend to monitor the following KPIs over the next financial year to measure how effective the processes have been:

- The number of employees who have received training on modern slavery risks and
- The number of suppliers we have carried out a risk assessment on



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