


## Modern Slavery Act Policy Statement 2015

### Our commitment

- i. We are committed to improving our practices to combat slavery and human trafficking. Steer Davies Gleave takes its obligations under the Modern Slavery Act 2015 very seriously and has robust working practices to comply with its obligations.
- ii. Steer Davies Gleave is a professional services independent transportation consulting firm. Our headquarters are in London, however, we have a global operation through our offices in Europe, North America, Latin America and India. We provide services to clients in the public and private sector and we are supported by a range of suppliers and subcontractors.
- iii. We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our Anti-Slavery Policy and our Blue Book reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- iv. Steer Davies Gleave has a long history of working with partner organisations, contractors and our business operating model relies on an integrated and seamless service to its clients. Our supply chain is underpinned by a rigorous contractual process.
- v. As an experienced and mature organisation, all our activities are underpinned by robust ISO9001 certified business processes. This certification is built into our Quality Management System, which defines the control systems and quality procedures and is used throughout the company to ensure we provide excellent advice to our clients. It is audited internally throughout the year and externally on six monthly basis.
- vi. As part of our initiative to identify and mitigate risk, we have in place systems to:
  - Identify and assess potential risk areas in our supply chain;
  - Mitigate or resolve any identified risk of slavery and human trafficking occurring in our supply chain;
  - Monitor potential risk areas in our supply chain; and
  - Protect whistle blowers.
- vii. Steer Davies Gleave has a zero tolerance policy to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we retain the right to audit our third-party contracts.
- viii. We also have a Compliance Support Team, which consists of involvement from the following:
  - Finance
  - Audit
  - Human Resources

- ix. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to the appropriate staff. We also require our Partners to provide training to their employees and suppliers and providers in their respective supply chain.
- x. We all have a responsibility to be alert to the risks, however, small, in our business and in the wider supply chain. With this in mind, any concerns from any Steer Davies Gleave employee regarding a likely risk, or actual, breach of policy or the legislation must be raised to the CEO or COO at the earliest opportunity.

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending 30 March 2016.*

Signed: 

Stephen C. Hewitt

**Chief Operating Officer**

Steer Davies Gleave

Date: 