

Anti-Slavery and Human Trafficking Statement

Introduction

At Cadogan* we are committed to preventing acts of modern slavery and human trafficking, both within our business and our supply chain. This statement sets out the actions we have taken to understand the risks to our business and puts in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business or our supply chains.

This statement relates to actions and activities carried out during the financial year ended 31 December 2018.

Our Companies

Cadogan operate in the property management, investor and development sector and are located in London. We only operate within the United Kingdom.

Our supply chains (the people or companies we purchase goods or services from) generally operate in the United Kingdom and Europe and the core of our workforce is UK based.

Relevant Policies

As part of our commitment to preventing modern slavery and human trafficking, we have implemented the following policies which set out our approach to preventing modern slavery and human trafficking:

- Equal Opportunities Policy
- Confidential Reporting (Whistle-blowing) Policy
- Bribery and Corruption and Conflicts of Interest and Anti-Money Laundering Policy
- Ethics/Ethical Purchasing policy
- Corporate Social Responsibility policy

Due Diligence

In order to monitor and reduce the risk of slavery and human trafficking occurring within our organisation and supply chains, we have adopted the following due diligence procedures:

- Employment is freely chosen by giving employees the right to choose to work, the freedom of association and the right to collective bargaining where a trade union has been formed or is recognised. Workers have the right to join or form trade unions of their own choosing and to bargain collectively.
- There are safe working conditions for staff and other relevant parties, by providing a safe and hygienic working environment in line with Cadogan's Health and Safety Policy, and any associated policies.
- There will be no recruitment or use of child labour, and all recruitment practices will support only employing or engaging individuals who are suitable and legally entitled to fulfil the role/supply the service etc.
- Training that is adequate and relevant will be made available to all staff, based on the nature and responsibilities of their role. This may include training on anti-slavery where relevant, for instance for those who recruit to roles in our companies, those who are in charge of purchasing, and those who work in countries where the risk of modern slavery is high.

- Goods and services will be purchased which are produced and delivered under conditions that do not abuse or exploit any people. These considerations will form part of the procurement process for all goods and services purchased by us.
- The procurement process has been re-designed to ensure it is sufficiently robust to identify issues.
- We build long-standing relationships with our suppliers, sub-consultants and subcontractors and make clear our expectations of business behaviour.
- We have in place systems to encourage the reporting of concerns and to protect whistle-blowers.
- We encourage anyone, including employees, consultants, contractors and suppliers, to report in good faith any issues or concerns about potential or possible ethics, human rights, legal or regulatory violations, including improper or unethical business practices.
- We play an active role in supplier development and have adopted various means to clearly communicate our expectations of suppliers. All suppliers will be required to sign a contract/terms of business which confirm that they will comply with our slavery/human trafficking policies and are committed to preventing slavery and trafficking.
- If suppliers refuse to sign up to these terms, we will not do business with them.
- If suppliers are found to be in breach of these terms, we will require the immediate cessation of those breaches and if necessary, terminate the business relationship between Cadogan and the supplier.

Through the implementation of these due diligence procedures, we are confident that we are assessing and monitoring the areas of risk in our business and supply chains and therefore reducing the risk of slavery and human trafficking occurring.

Risk Management

Cadogan have assessed the risk of slavery or human trafficking occurring in our supply chain and deem it to be low. We do not consider that we operate in a high-risk sector and our assessment is based on geography, the nature of our business, the nature of our business transactions and given the policies we currently have in place. However, if we do find any evidence of a failure to comply with our policies then, as above, we will consider terminating our relationship with the supplier.

Monitoring

The Chief Executive will take responsibility for ensuring that this statement is up to date and reflects the actions the organisation is taking to tackle slavery and human trafficking.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and relates to the Organisation's actions for the financial year ended 31 December 2018 and has been approved by the Board of Directors. We will periodically review this and issue a new statement each financial year.

Hugh Seaborn
Chief Executive
February 2019

* Cadogan as referred to in this statement includes the holding company, Cadogan Group Limited, and its subsidiaries, including one company with a turnover greater than £36m, being Cadogan Estates Limited.