

Modern Slavery Act 2015

Modern Slavery Statement

September 2023

Introduction

It is very important to us that we trade ethically, source responsibly and work to prevent modern slavery throughout our organisation and in our supply chain, because it is the right thing to do. This, our second Modern Slavery Statement, highlights the key activities we have undertaken during the past financial year, our achievements, and the next steps we intend to take to continue combatting modern slavery.

Our definition of modern slavery aligns with that of the International Labour Organisation (ILO) and includes all forms of exploitation for personal or commercial gain, including bonded labour or debt bondage, child exploitation, criminal exploitation, descent-based slavery, domestic servitude, forced & early marriage, forced labour, human trafficking and sexual exploitation.

Organisation structure

This statement applies to tp bennett LLP (referred to as 'tp bennett') and its wholly owned group undertakings including tp bennett Services Limited. All group entities are registered in England and Wales.

tp bennett Services Limited, a subsidiary entity wholly owned by tp bennett LLP (indirectly via a holding company), employs and provides the services of staff to tp bennett LLP. These staff are engaged in the provision of client service delivery, administration, and central support for the benefit of the business of tp bennett LLP.

Our business

We are a leading UK design practice founded in 1921 by Sir Thomas Penberthy Bennett and deliver world-class architecture, interiors, and planning consultancy to a wide range of cross-sector clients, both public and private, in the UK and globally. Our London, Manchester and Leeds studios are well known for their thriving, collaborative design environments where specialist sector knowledge, best practice and new ideas are shared amongst the wider practice, our clients, and external consultants.

As an international practice, we are currently engaged in many geographical locations. To enable us to provide high-quality services, we appoint regional third-party partners, sub-consulted to provide their specialist design & technical services and local/ cultural expertise to tp bennett LLP, with tp bennett LLP contracting directly with the client. Although we undertake projects outside the UK, all of our employees are based in the UK and therefore subject to the protections of the laws of England and Wales.

We had an annual turnover of £43.6m in the financial year ending 31 March 2023.

Our policies & governance

Our revised modern slavery policy reflects our intention to act ethically and with integrity in the way we run our business, how we conduct our business relationships, and how we will implement and enforce effective systems & controls that ensure, to the very best of our ability, modern slavery is not taking place anywhere in our supply chains.

We have a number of supporting policies, accreditations and management principles & practices in place that underpin our commitment, and which we continuously review and update:

- We pay all of our people above the Real Living Wage (weighted for London accordingly) and provide at least the statutory leave entitlement for holidays, maternity, paternity, adoption and parental/ dependents leave
- We ensure all employees have eligibility to work in the UK
- Although we have no reason to believe that there are any instances of modern slavery affecting (or perpetrated by) any employee or person directly involved in the running of our business, we nevertheless have a whistleblowing policy that protects any employee reporting concerns, where they wish to remain anonymous
- AdLib, which is our award-winning digital products & materials library. This is in essence a responsible sourcing charter for the suppliers we specify from, and is predominantly concerned with environmental sustainability. However, the supplier questionnaire it incorporates also aligns to UN Sustainable Development Goals under social & ethical sustainability

- B Corp application is underway with a target to be certified within the coming period
- We encourage all staff to keep up to date with any legislation changes and management updates through the staff intranet page. Information bulletins are uploaded continuously with industry-specific updates, and these will now include matters related to modern slavery

Overall accountability for this statement, our policies and procedures is held by the main board. Authority is delegated by them to our Chief Financial & Operating Officer (CFOO) and on to the Modern Slavery Compliance Lead and Modern Slavery Committee, which comprises representatives from our people & culture, sustainability, commercial, financial and legal teams. The committee meets quarterly to discuss progress on prescribed actions, any new risks identified, and reports through the CFOO to the main board.

Areas of risk

We are reviewing our wider governance and risk management framework to ensure it enables us to identify, monitor and manage key risks in the business, including modern slavery risk.

Following this period's detailed review of our supply chains, we have been able to confirm that our largest suppliers (in terms of spend) are predominantly related to premises costs (such as rent and business rates), IT costs, and professional sub-consultancy (in the course of delivering our design services).

We consider these types of supplier to be low risk in terms of modern slavery, but will keep this under review as part of our risk management framework.

We consider our primary exposure remains in the provision of architecture and interior design services outside the UK, the contracting of non-professional services (such as cleaning suppliers, security & maintenance contract labour), and the goods & materials we specify in our designs.

Our supply chains

We have identified two categories of suppliers in our supply chain:

- 1) Individuals or companies from whom tp bennett procures materials, products or services in a) the provision of multi-disciplinary design services, and b) the everyday running of our business:
 - **Professional services providers as sub-consultants:** Sometimes we are required to engage other professional services as sub-consultants, such as Principal Designer Advisors (PDAs), quantity surveyors, building services engineers, lighting designers, civil & structural engineers, landscape architects, and regional third-party design & engineering partners (as described above)
 - **Domestic goods & services:** This includes suppliers of goods and services such as banking, insurance, IT equipment & support, payroll, reception & hospitality, security, stationery, recycling, cleaning and catering
- 2) Individuals and companies who supply the materials and products tp bennett specifies in providing our design services:
 - **Specified products & materials:** We specify products and materials for our clients' consideration in their construction or fit-out projects, such as furniture, raw building materials (timber, bricks, concrete, plasterboard, steel), proprietary building systems (cladding, fall arrest, cleaning cradles, soak away, partitions), flooring, wall coverings, etc.

Supplier adherence to our values

We seek to partner with suppliers whose values and standards align with ours.

We have in the past used a basic sub-consultant engagement procedure when appointing professional services, which included a due diligence questionnaire covering the standard areas of business activity, and entailed specific questions relating to diversity, labour standards, health & safety, and modern slavery.

We have identified the need to establish more formal supply chain management procedures that mitigate a variety of operational & reputational risks through rigorous due diligence procedures on our existing and potential supply chain partners. This will involve interrogation of their operations and management systems (including prevention of modern slavery) and a Supplier Code of Conduct stating tp bennett's expectations, to which each supplier must agree to adhere.

Training

To ensure understanding of the risks of modern slavery and human trafficking in our supply chains and our business, information (including policies, procedures, videos, presentations, etc.) will be communicated to our new employees during their induction process, and then made available for reference on the practice intranet.

Current colleagues will receive similar training and guidance through workshops and online learning planned for later this year (please see below).

Our aim is to create and maintain awareness and understanding of modern slavery for all our people, whether they encounter it in their work or private lives, and what to do if this happens.

Progress on previous period's goals

Our goals for 2022/ 23, which was our first period of reporting, were purposely agile because we were eager to achieve what we had set out to. Quoted from last year's statement, we undertook to:

- *Conduct a more detailed review of our other supply chains (non-sub-consultant), identifying all suppliers we are actively engaged with that operate in potentially high-risk industries and/or geographies, and introduce a supply chain questionnaire for these suppliers*
- *Consider carrying out additional due diligence for international project pursuits in countries with some of the weakest responses to modern slavery and the highest risk*

Governance

We started by making sure we had the right governance in place. We appointed a Modern Slavery Compliance Lead, who steers the Modern Slavery Committee. The committee will meet quarterly, although as we work to establish new systems and procedures regarding modern slavery, meetings will take place every three weeks.

The committee reports directly to the CFOO, who is tasked by the main board to oversee and action all matters of policy, procedure, training & communication, etc. pertaining to modern slavery.

Training & research

The MS Compliance Lead and internal Legal Counsel attended an educational workshop given by Stronger2gether, an NFP organisation who offer training, resources and collaborative programmes regarding responsible recruitment, fair wages and the mitigation of labour exploitation.

This introductory training session included guidance on the applicable legislation and our responsibilities, as well as information specific to the construction industry, and how we can all prevent modern slavery if we recognise the warning signs and know how to act on them.

Sharing this information with colleagues, through a combination of online learning and a lunchtime CPD workshop, is planned for quarter four of this year.

Supply chain management

As outlined under 'Areas of risk' and 'Our supply chains', we have spent time interrogating our supply chains further to identify the partners we believe to be at a higher risk of modern slavery.

We have begun the process of developing a universal supply chain management system, through which we will operate robust due diligence mechanisms for new and existing suppliers. This will include those suppliers we believe to be at higher risk of modern slavery due to their global location or the industry in which they operate.

This is a significant operational change and is currently under development by appropriate people within the practice, including the Chief Commercial Officer (CCO) and MS Compliance Lead. The continuing development and implementation of this system will be a shared goal for the coming period.

Goals for the next period

Following steady progress on the goals we set ourselves in 2022-23, we intend to take the following steps to build on our achievements during the next period:

- Review, update, and republish our Modern Slavery policy – this will happen on an annual basis
- Continue the development and implementation of a suitable supply chain management system that includes interrogation of our suppliers' anti-slavery commitments and their effectiveness. This will include a Supplier Code of Conduct
- Begin the incorporation of the above into our wider, ISO:9001-accredited QMS, and its policies and procedures
- Ensure that our commitment in relation to modern slavery is integral to planning wider practice initiatives and processes, such as inductions & new starter handbook, the tpb Academy (continuous professional development seminars, webinars & workshops, research, conferences, and study for further academic and/or professional qualifications), AdLib, new supply chain management system, tpb+ affinity groups, etc.
- Continued engagement with initiatives in our profession and the wider construction industry who develop best practice in this area. These include Stronger2Gether Construction Industry Group, General Counsel for Architects Group, various committees chaired by the RIBA, the Architecture Financial Management Group, and B Corp programmes (following expected certification in Q2/3 2024)

Our effectiveness in combating modern slavery & human trafficking

We have not received any reported concerns related to modern slavery in our own operations.

The steps we are taking and processes we are implementing to prevent modern slavery in our business and supply chains, and equipping our people with the knowledge and means to report any incidences they encounter, or suspicions that might arise, will we hope prove effective in achieving our own desire to do our bit in the eradication of modern slavery. It will also add strength to the national and global cause.

We hope in due course to be able to measure our impact in this regard.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the financial year ending 31 March 2023.

It was approved by the main board on 11 September 2023.



Nenad Manasijevic
Principal Director



Mark Davies
Principal Director

Date: 25 September 2023