

## **MODERN SLAVERY ACT 2015 STATEMENT STATEMENT FOR THE FINANCIAL YEAR ENDED 31<sup>st</sup> DECEMBER 2024**

### **INTRODUCTION**

This statement is made on behalf of Lambert Smith Hampton Group Limited (“LSH”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and comprises our slavery and human trafficking statement.

### **OUR BUSINESS**

LSH is a Professional Property Services business, providing consultancy, transactional and property management advice to clients, predominantly in the UK, charging fees for its services.

We manage the Group through three operating streams:

Transact  
Operate  
Consult

Our service lines are headed by professionally qualified staff with specialist experience and qualifications in their fields.

LSH does not operate in an industry or in geographical locations with a high risk of modern slavery and our risk assessment indicates low risk of modern slavery or human trafficking within our workforce and supply chain.

### **OUR SUPPLY CHAIN**

LSH work with a supply chain who supply us with services, goods and work. Predominantly, our supply chain consists of UK based professional services companies and other UK based providers such as utilities providers and business service providers, which we have assessed as low risk for modern slavery and human trafficking. We operate a supplier management system which requires our suppliers to answer questions about their own modern slavery and human trafficking policies and procedures, employment practices and risk assessment in their own supply chains at onboarding stage. Suppliers are also required to sign up to our Code of Conduct which sets out clear requirements in respect of labour practices. All responses are reviewed by our supplier management team prior to engagement and payment of any suppliers.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Our Modern Slavery and Human Trafficking Policy reflects 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 business and/or within our supply chains.

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Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply chain to report suspected breaches of our policy.

Our Supplier Code of Conduct clearly sets out LSH’s expectations in respect of supplier management of modern slavery and human trafficking risk.

**DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our procedure to identify and mitigate modern slavery risks, we nominate senior representatives of the business units and support functions, who in turn report to the Compliance Committee, chaired by the Director of Risk Management and Compliance.

We have systems in place in our business to:

- Identify inappropriate employment practices.
- Identify and assess other potential risk areas.
- Mitigate the risk of slavery and human trafficking occurring.
- Monitor potential risk areas.
- Protect whistle-blowers.

The effectiveness of our policies and procedures is reviewed annually via risk assessment and revision/publication of this Statement.

**TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and in our supply chains, we provide relevant training to all LSH staff on an annual basis. All staff are additionally required to read and attest adherence to our Modern Slavery and Human Trafficking Policy.

**KEY PERFORMANCE INDICATORS**

In January 2023, we commenced collation of key performance indicators (KPIs) to measure the effectiveness of our modern slavery awareness training within our employee base and analysis of modern slavery detection and controls within our supply chain on a risk assessed basis as follows:

**KPI 1 – Staff training and awareness raising**

We deliver a bespoke training module via our e-learning platform to every member of staff, including new starters within 3 months of joining, repeated at 24 month intervals. The training includes an overview of the global situation of modern slavery, training on how to identify those at risk; it emphasises the responsibility to report and provides instructions on how to report. The training also provides an overview of national legislation and context-specific vulnerabilities. It includes a mandatory test to validate learning and understanding. For the two year period ending 31<sup>st</sup> December 2024, 1016 staff had successfully completed the training module from a staff total (adjusted for leavers) of 1059, representing 96% of staff employed in the period.

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**KPI 2 – Due Diligence on Suppliers**

LSH operates a supplier management system that requires key suppliers to the business to complete a due diligence questionnaire, which includes questions on the existence of Modern Slavery policies, procedures, statement and training delivered. Responses are reviewed by our Supply Chain Manager and additional due diligence undertaken where required. Suppliers are additionally required to sign up to the LSH Supplier Code of Conduct which sets out our corporate expectations in respect of Modern Slavery and Human Trafficking policies for the supplier and their own supply chain.

For the two year period ending 31<sup>st</sup> December 2024, 401 suppliers successfully completed the questionnaire and were onboarded as ‘approved contractors’. A further 527 suppliers have been requested to complete the onboarding questionnaire. 220 of these are advanced in completing the questionnaire but are not yet approved.

**KPI 3 – Modern slavery and human trafficking detection in LSH and the supply chain**

In the year period ending 31<sup>st</sup> December 2024, we detected 0 (zero) indicators of modern slavery or human trafficking within the supply chain and there were no safeguarding whistleblowing reports made by staff.

In late 2024, we reviewed and improved our Whistleblowing Policy and Procedures and rolled out additional training to staff via our e-learning platform. Whilst our risk assessment indicates that we are a low risk business for modern slavery and human trafficking, we recognise that our staff have a key part to play in early identification of risk indicators and identified a need to reinforce our existing whistleblowing policy.

In 2025, additional efforts will be made to ensure that suppliers complete onboarding questionnaires allowing assessment of Modern Slavery Act compliance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2024. It has been reviewed and approved on 22<sup>nd</sup> January 2025 by the Management Board and is signed by the Finance Director.

Signature: 

Date: 22<sup>nd</sup> January 2025

Name: Jason Honisett – Finance Director

LAMBERT SMITH HAMPTON GROUP LIMITED

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