

Policy Title	Modern Slavery and Human Trafficking Transparency Statement
Policy Owner	Legal
Policy Approver(s)	Board of Directors
Effective Date	2015
Country	United Kingdom
Next Review Date	

Modern Slavery and Human Trafficking Transparency Statement - FY2019

This statement is made, approved and published pursuant to section 54 of the UK Modern Slavery Act 2015.

Altus Group has a zero-tolerance approach to slavery, human trafficking and forced labour, both within our business and in our supply chain. Our commitment to acting ethically and honestly in how we do business is underlined in our Code of Business Conduct.

Our Business and Supply Chain

Altus Group is one of the leading global providers of property consultancy and other professional services. The parent company, Altus Group Limited, is registered in Canada and achieves a global annual turnover of more than £36m. We have a UK subsidiary, Altus Group (UK) Limited, with offices in the UK as well as offices in Canada, Luxembourg, United States, Australia, and Asia.

The provision of professional services is a low risk industry, and many of our employees are regulated professionals. We therefore consider the risk of slavery and trafficking within our business to be low.

Our supply chain supplies us with a variety of business and technical solutions. Most of our suppliers are internationally recognised companies, some of whom employ people in high risk areas and high-risk industries such as manufacturing.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain. Our Code of Business Conduct reflects our commitment to acting ethically and with integrity in all our business relationships, and all of our employees are legally bound to it. It also requires any of our personnel who become aware of any illegal or unethical behaviour to report it to executive officers or other appropriate personnel.

This commitment to ethical business practices is also further protected by our Whistleblowing Policy.

Procurement process and supply chain compliance

Our suppliers are carefully selected and approved. All of our supplier relationships are reviewed on a regular basis.

Most of our major suppliers are contractually bound to obey all local laws including employment or labour laws. Any suggestion that a supplier might be in breach of this commitment by engaging in slavery, human trafficking or other form of forced labor or servitude would result in an investigation and would render the contract liable for termination.

Training

Our employees receive training regarding the COBC upon joining Altus Group and are expected to uphold the principles of the COBC throughout their employment with the company. Beginning in 2017, employees will be required to annually certify compliance with the COBC and other company policies, including this statement.

Further steps

Following a review of our current practises in this area, we propose to take the following steps in FY17 to further decrease the risk of slavery and human trafficking in our supply chain and to make sure that where there is risk, this is correctly addressed:

- i) Review our procurement and due diligence practices to ensure that these issues are being effectively identified before we engage with suppliers;
- ii) Where appropriate or where risk is identified, seek contractual obligations and warranties from our suppliers concerning compliance with slavery and human trafficking laws and establish procedures to monitor that compliance.

Signed by: "Liana Turrin"

Position: General Counsel and Corporate Secretary

On behalf of the board of directors of Altus Group Limited