

NBBJ Anti-Slavery and Human Trafficking Statement

Our Policy

NBBJ takes a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

As NBBJ's Code of Conduct reflects, NBBJ is committed to conducting business with integrity and in compliance with all laws and policies applicable to our global practice, always aspiring to the highest ethical standards. Our Manifesto further embodies our commitment to understand, celebrate and protect what is inherently human and to serve as advisors and activists in our work and word to confront pressing global challenges like social inequality and modern slavery. We address these issues at the core of our business.

NBBJ further seeks to prevent modern slavery by maintaining a safe and non-hostile work environment. We are committed to complying with all laws governing workplace safety and environmental health to create a productive, healthy and safe work environment wherever we provide services.

Due Diligence and Internal Systems and Controls to Counter Slavery and Human Trafficking

NBBJ has a Compliance Committee comprised of its General Counsel, Chief Operating Officer and its Partner in charge of International Practice to ensure compliance with the Modern Slavery Act 2015 and all other laws and policies applicable to our global practice. NBBJ also maintains a dedicated Legal Team, Human Resources Team, Finance and Audit Team and Marketing/Procurement Team all of whom work together to ensure that all those in our supply chain comply with our values. These teams are engaged early and consistently to provide due diligence review of all business associates and transactions, particularly international transactions, to ensure NBBJ is in compliance with all applicable laws and policies including the Modern Slavery Act 2015.

NBBJ requires its employees and business associates to report all suspected or actual violations of the Code of Conduct and any other fraudulent, illegal or unethical activity including modern slavery to the Compliance Committee which, in consultation with the firm's Board, monitors and addresses on a real time basis all suspected and actual violations. NBBJ maintains a confidential hotline for reporting of all suspected or actual violations of the Code of Conduct and the law, including instances of modern day slavery. The hotline is monitored by the General Counsel on a daily basis, and the Compliance Committee meets regularly (but no less than quarterly) to address violations or compliance issues as they arise.

NBBJ strictly prohibits victimization of or retaliation against anyone seeking guidance or reporting any activity required by the Code of Conduct or the law, including instances of modern slavery.

Continuing Improvements to the Policy

NBBJ is in the process of updating and enhancing its Code of Conduct as well as its Anti-Slavery and Human Trafficking Policy to include training for staff and enhanced due diligence processes to identify risks and prevent modern slavery in its supply chains. We are also incorporating, as part of our contracting processes, specific prohibitions against the use of forced, compulsory or trafficked labour. We have prepared a draft Anti-Slavery and Human Trafficking Policy for Consultants and Business Associates which we will use to educate our supply chain.

Finally we will publish an updated version of this Slavery and Human Trafficking Statement on our website when and as required by the Modern Slavery Act 2015.