

Gordon & Co. anti-slavery and human trafficking statement

This statement is made on behalf of Gordon & Co. ("the Company") in accordance with Section 54 of the Modern Slavery Act 2015 ("the Act") for the financial year ended 4 April 2020.

Organisation structure

Gordon & Co. has been selling, letting and managing residential properties across South London since 1948. The company is wholly owned by IMM Properties Ltd, and has 50 employees. The company operates 4 offices in the UK and an office in Hong Kong. Our Regulators are the ARLA and NAEA.

Our policies

We are committed to ensuring that there is no modern slavery, servitude and forced compulsory labour or human trafficking in our supply chains or in any part of our business. We have developed an Anti-Slavery Policy to raise awareness and reinforce this commitment at all levels across the Company.

Implementing our values

We have zero tolerance to slavery and human trafficking. Our senior management team oversee our compliance to this policy and manage the progress, improvement and further implementation of our risk and compliance policies and procedures.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and any risk related to our own business, we ensure all of our staff have training. Our Whistleblowing Policy, available on our company drive, provides a mechanism for our employees and others working in our supply chain to raise any concerns about suspected wrong doing or breaches of our policies or the law with confidence and without fear of reprisals.

Employment

We have robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment. We also have market-related pay and reward, which is reviewed annually. On occasions where we use employment agencies, we only work with specified, reputable agencies to source employees.

Supply chain risk

Our supply chains include:

- Office cleaning suppliers
- IT hardware and software suppliers
- Telecoms providers
- Office equipment suppliers
- Contractors
- Utility Providers

- Professional Service Companies
- Corporate Landlords
- Resident Management Companies

We understand that our biggest exposure to modern slavery lies within our supply chains. We intend to take a risk-based approach to reviewing supply chains that fall within industries that may carry a higher risk of modern day slavery.

Due diligence processes

As part of our initiative to identify and mitigate risk, we carry out appropriate due diligence when engaging and working with suppliers, whilst also ensuring that the work undertaken is proportionate to the services provided and the risk involved.

The Directors have examined the risk of modern slavery and human trafficking within the group and concluded that such risk is low. We check every prospective employee's right to work status before offering employment unconditionally.

We but subject every prospective lettings tenant to a rigorous referencing system run by external reputable insurers.

The Directors have also examined the risk of modern slavery and human trafficking within our suppliers of goods (such as suppliers of office equipment) and services (such as professional services) and concluded that such risk is low. The businesses we use to supply us with goods and services are generally large reputable organisations. We only engage with and buy our equipment from reputable organisations with significant and reliable online presence, which would help to ensure we do not indirectly encourage modern slavery or human trafficking.

This statement has been approved by the company's Directors on 18 August 2020 and signed by Bradly Ward (Director). This statement and its objectives will be reviewed and updated as appropriate.



Bradly Ward, Director
Date: 18 August 2020

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