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Slavery and Human Trafficking Statement

INTRODUCTION

Broadway Malyan Holdings Limited and our subsidiary companies (together “Broadway Malyan”) are committed to improving practices and maintaining procedures and controls designed to ensure modern slavery or human trafficking is not taking place in our business or supply chain globally.

OUR ORGANISATION & SUPPLY CHAIN

Broadway Malyan is a global architecture, urbanism and design practice dedicated to creating cities, buildings and places that will provide a lasting legacy. Through a shared design ethos, we work together to create places with a strong sense of identity where people and communities want to live, learn, shop, work and relax.

We have approximately 500 employees and operate in the United Kingdom, Europe, Africa, the Middle East, Asia Pacific and the Americas.

Our supply chain primarily comprises professional infrastructure consultancy providers, acting as sub-consultants. We also engage with suppliers of services for our offices, such as, facilities management, travel, insurance and office equipment.

We seek to partner with suppliers whose ethical principles align with our own. We expect our suppliers to operate fair and ethical workplaces. We have updated our standard form contracts to add, where possible, a contractual provision ensuring compliance with the Modern Slavery Act 2015.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We currently have a number of policies which govern all aspects of modern slavery and human trafficking, these policies include the proper management of recruitment and cover the standards we expect of our employees, including our whistleblowing procedures. As part of our commitment to improvement we are developing a Global Code of Conduct which will be launched in 2019.

Our Global Code of Conduct and associated Modern Slavery Act Policy will reflect our commitment to acting ethically and with integrity in all our business relationships. It will include steps to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Our Risk, Audit & Legal Committee has oversight of any modern slavery risks within our supply chain and regularly engages with parts of the business which could be more at risk.

We have in place systems to:

- Monitor potential risk areas in our supply chains.
- Encourage voluntary reporting and to protect whistle blowers in accordance with our global whistleblowing policy and procedures. All employees can approach the Legal Director & Company Secretary with any concerns.

Our Risk, Audit & Legal Committee reports biannually to the Board of Directors.

RISK ASSESSMENT

Our work is predominantly with large developer clients to whom we provide architectural and design services and whose businesses are transparent, visible and subject to considerable stakeholder oversight. We may be novated to building

contractors during the life cycle of a project and the business is selective and careful in agreeing with whom we will work and the terms of such engagement. We employ highly educated and highly skilled architects and other similarly qualified and experienced business professionals. For other roles, we ensure compliance with market standards and national minimum wage obligations. We monitor our third party suppliers and require them to comply with all applicable laws, statutes and regulations. Modern slavery compliance contract wording is negotiated into our contracts with third parties.

We identify the key area of risk in our supply chain is the risk of third party Company's employing low skilled migrant workers. We mitigate this risk by working only with reputable third parties with whom we have built long term and strong relationships.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

In the two prior financial years and to date, we have not received any reported concerns relating to modern slavery or human trafficking.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business staff receive our existing policy as part of their induction package. Additionally, training is being rolled out to our staff in conjunction with the introduction of the new Global Code of Conduct, which will be implemented in 2019.

Our next financial year ends on 30 April 2019. In advance of the year end this constitutes our slavery and human trafficking statement in respect of the 2018/2019 financial year. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is made by the Ian Apsley, the acting managing director and a member of and authorised by the Board of Directors.

[Archive Statements](#)

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