

Social, Ethical and Environmental Procurement Guidelines



These guidelines are to be read in conjunction with the Tendering and Responsible Procurement Policy. Procurement practices shall adhere to the following guidelines:

Social Responsibility

Modern Slavery

Knight Frank is fundamentally committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of the business. As a professional services supplier, we work to provide our clients with the highest level of service attainable. We hold ourselves to the utmost standards of professional conduct and accept nothing less from our suppliers. Suppliers are expected to have procedures in place to comply with the Modern Slavery Act 2015 and to have provided training to their workforce.

Forced Labour

Knight Frank and our suppliers will not use forced, bonded or involuntary prison labour. Forced labour is described by the International Labour Organisation (ILO) as work carried out under the threat of penalty, the most common types being bonded labour and use of prisoners. We will ensure that supplier's employees are free to choose to work for the supplier and free to leave the supplier after reasonable notice is served.

We seek to act in accordance with the principles set out in the following international standards:

- the [International Bill of Human Rights](#)
- the [International Labour Organisation \(ILO\) Declaration on Fundamental Principles and Rights at Work](#), and
- the [United Nations 2011 Guiding Principles on Business and Human Rights](#).

Employment Relationship

Suppliers must establish recognised employment relationships with their employees that are in accordance with their national law and good practice. Employees must be provided with an easy-to-read contract of employment, with clarity in relation to wages. In the event employees are unable to read, the contract of employment should be read out and explained to them by a union representative or another appropriate third party. Suppliers must not do anything to avoid providing employees with their legal or contractual rights.

Wages and Working Hours

We encourage our supply chain to provide their employees with wages that exceed National Minimum Wage and National Living Wage levels.

Working hours should comply with national laws or industry standards. Suppliers' employees should not be expected to work more than 48 hours per week on a regular basis and overtime should be voluntary and not be demanded on a regular basis.

Treatment of Employees

No harsh or inhumane treatment is allowed by our suppliers. Under no circumstances should suppliers abuse or intimidate employees. Suppliers must have a grievance/appeal procedure that is clear and understandable, and this should be given to the employee in writing. If supplier's employees are unable to read, the grievance/appeal procedure should be read out and explained to them by a union representative or another appropriate third party.

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Child Labour

Knight Frank and Suppliers shall develop or participate and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. Knight Frank and Suppliers shall not employ children and young persons under 18 at night or in hazardous conditions. In any event the course of action taken shall be in the best interest of the child, conform to the provisions of ILO Convention 138 and be consistent with the United Nation's Convention on the Rights of the Child.

Discrimination

No discrimination is practised. Suppliers must have a policy of equality for all in the workplace, with no discrimination based on race, caste, religion, nationality, age, gender, marital status, sexual orientation, disability, union membership or political affiliation.

Diversity, Equity & Inclusion

At Knight Frank we want to create a diverse, equitable and inclusive culture where 'Everybody Thrives'. We are a business that recognises the multiple dimensions of difference across our entire partnership to enable our colleagues, clients, suppliers and communities to achieve their full potential. Our suppliers must be committed to protecting their employees from discrimination and promoting diversity of the workforce responding to changing demographics and working patterns. Suppliers are expected to promote and act upon DE&I within their organisation, ensuring all employees are trained in these principles and monitor its own performance.

Ethical

Bribery and Corruption

Knight Frank does not tolerate the giving or receiving of bribes, including the making of facilitation payments. It is expected that all Partners/Directors, employees, suppliers and consultants working for or on behalf of Knight Frank comply with these principles in the performance of their services. Suppliers are expected to comply with and have trained their workforce in accordance with the Bribery Act 2010.

We expect our suppliers to comply with all applicable laws, statutes, regulations relating to anti-bribery and anti-corruption including but not limited to the UK Bribery Act 2010 and to not engage in any activity, practice or conduct which would constitute an offence under the Act. We do not tolerate fraudulent or corrupt behaviour or engage in bribery or any form of unethical inducement or facilitation payments, and do not tolerate any such behaviour from our business partners.

We will never ask suppliers to pay to be included on an approved or preferred supplier list. Suppliers are selected based on meeting the appropriate and fair criteria.

Criminal Finances Act

Knight Frank will not tolerate any activity that constitutes an offence under the Criminal Finances Act 2017 ("the Act"), including but not limited to any form of, or facilitation of, tax evasion or fraudulent activity related to taxation whether in the United Kingdom or abroad.

We expect our suppliers to comply with all obligations imposed by the Act in connection with the provision of goods/services. Our suppliers shall maintain adequate procedures to prevent tax evasion and shall ensure that any of its agents, consultants, contractors, subcontractors or other persons engaged by the supplier's also comply with the obligations set out in the Act.

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Whistleblowing

Knight Frank is committed to the highest standards of probity and accountability as regards anti-bribery, corruption, and ethical conduct. Accordingly, we expect our employees, suppliers, agents, consultants, contractors, subcontractors, and anyone with whom we conduct business who have serious concerns about these issues to come forward and voice those concerns using the whistleblowing hotline.

Payment Terms

We will be open, transparent, and fair in our communications and dealings with suppliers and other stakeholders affected by our supply chain activities. We will take reasonable steps to ensure that we fulfil the payment terms and other conditions agreed with our suppliers. Supplier evaluation documentation and decision-making criteria must be held on file. We will publish our payment reports on [Gov.uk](https://www.gov.uk). Suppliers are expected to have a prompt payment policy in place and actively monitor their performance in meeting this objective.

Tender Process

We ensure that the procurement policy and process is transparent, robust, compliant, fit for purpose and gives the right level of authority control and, where applicable, in accordance with the RICS Service Charge Code of Practice.

Health and Safety

We expect our suppliers to share our commitment to place the health, safety and security of employees and others who could be affected by their activities at the heart of their operations by implementing robust policies and procedures.

Data Protection

From time to time our suppliers may have access to personal information about Knight Frank employees. Our suppliers must treat this personal information properly and securely however it is collected, recorded and used (whether on paper or in electronic format) and we recognise that there are safeguards to ensure this in the General Data Protection Regulation (EU) 2016/679 adopted by the European Parliament on 14 April 2016. Knight Frank LLP regards the lawful and correct treatment of personal information as essential to the successful and efficient performance of its services, and to retain the confidence of those with whom it deals. Knight Frank has a governance process and supporting policies, procedures and processes to support compliance to the GDPR and DPA2018. Please refer to the Data Protection Policy.

Transparency, Confidentiality and Fairness

All suppliers will be treated fairly and even-handedly at all stages of the procurement process. This means being open with all those involved, so that everyone, especially suppliers, understands the elements of the process. Supplier confidentiality is safe-guarded, and unsuccessful suppliers are debriefed with as much transparency about the procurement process as can be provided, for example, on the weaker aspects of their tender.

Engaging with Third Parties

No single Knight Frank employee should have control over the selection, management and payment of third parties. That is, no Knight Frank individual should be able to negotiate the terms of business with a third party (including their level of remuneration), authorise the entry into a binding contractual relationship with them, authorise their invoices and then action payment without any oversight from another colleague.

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Declaring an Interest

All personal interests must be declared. We request that Knight Frank employees declare any material personal interest which may affect, or be seen to affect, their impartiality, or judgement, in respect of their duties. Examples include owning a significant shareholding in a supplier or close family members being employed by a key supplier.

Encouraging SME's

We will make ourselves aware of opportunities to support the local community and SME's either directly or via our suppliers, whilst maximising opportunities for national/global sourcing. It is good practice to balance the risk of awarding contracts to new or small suppliers with the opportunity of encouraging new business to flourish. It is not good practice to exclude suppliers simply because they are small or new to the market. Capability and experience are examples of relevant supplier selection criteria.

We will implement this by:

- increasing our supply chain's awareness and tracking their local capacity;
- sharing and implementing best practice;
- streamlining our procurement processes;
- simplifying our procurement documentation;
- increasing robustness of data collection.

Environmental

Knight Frank is committed to a programme of continuous improvements to reduce any harmful impacts of our operation on the environment and to prevent pollution.

By monitoring the environmental performance of our suppliers and gathering information on their formal Environmental Management Systems, we can use this information to drive higher procurement standards. We expect our supply chain to ensure compliance with relevant environmental legislations, as well as standards and codes specific to their industry.

Environmental and energy awareness must also include looking at opportunities to enhance our environmental and energy performance.

Suppliers providing larger services, or at a regional/national level will be expected to demonstrate the following:

- operate an environmental management system that is sufficient to cover the works proposed;
- that their responsibility for environmental management is shared across all functions of the supplier's business;
- can demonstrate compliance with relevant environmental legislation;
- have a clean record in terms of any prosecution and convictions under Environmental Legislation within the last 3 years;
- evaluate and control environmental aspects associated with any service carried out by sub-suppliers they may employ;
- minimising the use of energy, water and raw materials where practical at every stage of their business processes;
- maximise the use of recyclable and renewable materials including energy where possible;
- make practical efforts to minimise waste and dispose of it in a safe, efficient, and environmentally responsible manner;

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- avoid contamination of the local environment and ensure that emissions, air, noise and odour pollution is, as a minimum, within nationally defined limits;
- actively encourage the employment of qualified local people and the use of local/regional distributors;
- contribute towards building local skills through either apprentice schemes, trainee schemes or through work within the community.

The following documents also form part of these Guidelines:

- Tendering & Responsible Procurement Policy
- Tendering and Responsible Procurement Processes

Application and Communication

These guidelines will be communicated to all employees in the UK and be available to all via *Global Life*. Any questions should be directed to Sarah Chappelle-Molloy, Head of Procurement.

Review

These guidelines will be reviewed at least every two years. If there is a business or legislative reason for it to be reviewed more frequently, then this will be conducted by the Head of Procurement.

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Prepared: 3rd July 2024

Signed: Sarah Chappelle-Molloy

Position: Partner, Head of Procurement

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