

Modern Slavery Statement

Published January 2026



Modern Slavery Statement

Perfect Circle has taken steps to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business. This statement is only in relation to Perfect Circle and its business. References to “our people” only refers to those individuals working on behalf of Perfect Circle

In accordance with Section 54, Part 6 of the Modern Slavery Act 2015 (the Act).

This statement sets out the steps that Perfect Circle has taken to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business. This statement is in respect of Perfect Circle’s financial year and was approved by the Chief Executive on 2nd January 2026.

Overview

The Act requires commercial organisations supplying goods or services with a turnover of more than £36 million to prepare and publish an annual 'Slavery and human trafficking statement'.

The statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its business or supply chain.

What is modern slavery?

Modern slavery is an international crime, affecting millions of people around the world - a growing global issue that transcends age, gender and ethnicities. Sadly, vulnerable people from overseas as well as across the UK, are forced to work illegally against their will across many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

Our organisation and supply chains

Perfect Circle is an incorporated Joint Venture. Jointly owned by industry leading consultancies Pick Everard, Gleeds and AECOM, we are supported by an extensive supply chain of more than 500 partners, formed of micro businesses, SMEs and larger consultancies. Our people policies ensure fair treatment of our people and or our supply chain.

Our supply chain is mostly UK based companies in low-risk sectors (such as professional services).

Our specific policies in relation to modern slavery and human trafficking

Perfect Circle has established a zero-tolerance position on violations to the UK’s anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation.

Our Values and Code of Conduct embody everything that we do at Perfect Circle and how we do business. They outline the expectation of our people’s behaviour with colleagues, member firms, supply chain and people worldwide.

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

Our specific procedures to address modern slavery risk include:

- A 'Modern slavery policy' for our people, which sets out the key issues and how we should respond including a process for raising concerns internally
- An ethics hotline that allows for anonymous reports to be submitted by our people
- A process for handling complaints raised by people outside of Perfect Circle
- Employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace
- Robust recruitment processes in line with relevant employment laws
- Market-related pay and rewards reviewed annually
- Wellbeing strategy and initiatives to support our people's physical and mental wellbeing and lifestyle choice
- A 'Procurement policy' for how we deal with suppliers and a 'Supplier code of conduct' making clear the standards we expect.
- Due diligence processes, risk assessment and management

The implementation of our policies and procedures includes due diligence on suppliers that we engage with, in accordance with our policies. A heightened risk area is the use of hotel and conference facilities. To mitigate against this risk, we assess the companies that we deal with as part of the decision-making process for events and travel.

When we engage a new member company/supplier in Perfect Circle, a thorough due diligence process takes place to ensure that the firm has a good reputation with appropriate practices in a number of areas including people and culture.

Key performance indicators to measure effectiveness of steps being taken

We log complaints received via our ethics hotline system or through other sources, together with the actions taken. To the date of this statement, Perfect Circle has had no identified instances of modern slavery.

Training on modern slavery and trafficking

Perfect Circle provides periodic training to our people on the subject of modern slavery and our policies to address the risks to help increase education and awareness.

If you would like to find out more about the above, please email PC Management.

Perfect Circle takes responsibility for this Statement and its related objectives and will review and update it in accordance with The Act.

Updated 2nd January 2026 with the next annual statement due in January 2027.

Signed for on behalf of Perfect Circle:



Victoria Brambini

Chief Executive