



## Modern Slavery and Human Trafficking Statement 2016

Great Portland Estates plc ('GPE') is a property investment and development company owning, managing and developing through its joint ventures and subsidiaries, which include Pontsarn Investments ("PI"), over £3.7 billion of real estate in central London. The Group has around 100 direct employees, based either at head office or at buildings within the portfolio.

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 (the "Act") and covers the activities of GPE and PI.

### Our policy in relation to slavery and human trafficking<sup>1</sup>

We are committed to seeking to ensure that there is no slavery or human trafficking within any part of our businesses or in our supply chains, which include asset management and development contractors, subcontractors, service providers, suppliers and professional services providers. During the year ended 31 March 2016 and subsequently, we have implemented the following steps to ensure that slavery and human trafficking is not taking place in any of our business or supply chains. We have:

- conducted a risk assessment in relation to slavery and human trafficking associated with our supply base. Our preliminary assessment is based upon the undertakings conducted across our asset management, development and head office activities. These include contracted workers employed in our asset management activities, contracted workers employed in our development and refurbishment activities, and labour used in the production of materials used in our developments;
- updated our [Sustainability Policy](#) under which we expect our suppliers to review their own supply chains to ensure that products and services they use are sourced from responsible suppliers. In addition, in our Development Brief for all developments and major refurbishments we have included requirements on responsible sourcing of materials, in particular, the use of FSC project certification with its inclusion of aspects in connection with human rights for communities and forest workers;
- designed and implemented a [Supplier Code of Conduct](#) which specifically addresses involuntary, forced, human trafficked or slave labour including indentured, bonded and child labour. Those suppliers identified under our risk assessment as being most at risk through their supply chains of slavery and human trafficking have been asked to acknowledge their understanding and commitment to both our Sustainability Policy and Supplier Code of Conduct. Further, the Code permits GPE to undertake spot checks and to make information requests of suppliers to ensure that they have processes in place to prevent forced labour within their own supply chains;
- ensured that all new relevant GPE contracts incorporate compliance with the Act

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<sup>1</sup> For the purposes of this statement, references to slavery and human trafficking are based upon the definition in the UK Modern Slavery Act 2015.

- requested our contractors minimise the use of agency staff at our properties in relation to our asset management activities. This is designed to minimise the risk of labour exploitation within our supply chains;
- mandated that all construction contracts over £250,000 be registered under the Considerate Constructors Scheme which requires contractors to undertake spot checks to ensure the legitimacy of the workforce on site;
- added slavery and human trafficking as a standing agenda item at all our Development Project Principals meetings. This is designed to heighten awareness of the risk of slavery and human trafficking within ongoing development projects and ensure it is maintained as a focal issue; and
- widened the scope of the [GPE Whistleblowing Policy](#) to include the reporting of slavery and human trafficking, so that any individual may confidentially raise a potential issue. The Policy is also available to employees to access on the company intranet.

Oversight of the actions outlined in this statement will be undertaken by our Head of Sustainability.

### **Training**

All GPE employees with responsibility for asset management or development activities will be provided with training to ensure they have a clear understanding of the risks of slavery and human trafficking within our activities and supply chains. For all new employees this will be covered by our Head of Sustainability as part of our formal induction process.

### **Ongoing effectiveness**

During the year ending 31 March 2017, based on our on-going risk assessment of activities, we will consider undertaking spot checks in relation to selected development sites and asset management contractors using a third party to review our contractors' policies and procedures in respect of the employment of direct and subcontracted labour. Whilst we have no reason to believe that slavery or human trafficking have occurred within our supply chains based on the actions and measure taken above, we will work with our development, refurbishment and asset contractors to consider relevant training and to develop best practice in the prevention and detection of slavery and human trafficking within our development supply chain.

Approved by the Board on 21 September 2016 and signed on its behalf by



Toby Courtauld  
Chief Executive  
Great Portland Estates plc



Toby Courtauld  
Director  
Pontsarn Investments Limited

There is a link to this statement on the GPE website and a copy is available upon written request.