



## **Slavery and Human Trafficking Statement 2018**

Great Portland Estates plc ('GPE') is a property and development company owning, managing and developing real estate solely in central London through its joint ventures and subsidiaries including Ponsarn Investment Limited ('PI'). The Group has around 100 direct employees, based either at its 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. The Company supports Article 4 and more generally, the principles of the UN Universal Declaration of Human Rights.

### **Our business and supply chain**

Our portfolio consists of commercial and residential property located within London. Our business model requires us to work with diverse suppliers to develop and operate our portfolio.

Through our modern slavery and trafficking risk assessment we have concluded that based on our own policies and procedures, the risks of slavery or human trafficking in the recruitment and engagement of our employees is low. In addition, in conjunction with our HR team we have the following policies in place:

- Equal opportunities, harassment and bullying Policy
- Ethics Policy
- Whistleblowing Policy

These policies are communicated to all employees through our induction process and are accessible to all employees on our Intranet.

We recognise that we have a responsibility to work with our suppliers and are committed to seeking to ensure that there is no slavery, forced labour or human trafficking within any part of our business or in our supply chains, which consist of asset management and development contractors, subcontractors, materials suppliers and professional service providers.

Our risk assessment, identified that our highest risks were connected with our construction and refurbishment contractors, sub-contractors and supply chains involved with the procurement of materials for our development projects. Within our occupied portfolio, we identified that our highest risk suppliers were connected with cleaning and waste management processes due to the nature of the work and diversity of those workforces.

### **Policies and supply chain due diligence for the year ended 31 March 2018**

Under our [Sustainability Policy](#), we expect our suppliers to review their own supply chains to ensure that products and services they use are from responsible suppliers.

In our [Sustainable Development Brief](#) for all developments and major refurbishments, we have included requirements on responsible sourcing of materials, in particular, the usage of FSC certification with its inclusion of aspects in connection with labour human rights for communities and forest workers.

We support the objectives of the Gangmasters and Labour Abuse Authority's Construction Protocol which aims to eradicate slavery and labour exploitation in the building industry. Suppliers are encouraged to engage with BES 6001 The Framework Standard for Responsible Sourcing and BES 6002 The BRE Ethical Labour Sourcing Standard, which promote the responsible sourcing of both labour and materials.

Our Supplier Code of Conduct provides more detail on the standards that we require of our suppliers and specifically addresses involuntary, forced, human trafficked or slave labour including indentured, bonded and child labour.

All construction and refurbishment works from minor projects to our largest developments must be registered under the Considerate Contractors Scheme, which measures our contractors and construction sites against health and safety and social criteria.

Slavery, forced labour and human trafficking is a standing agenda item at all our major project Principals meetings to heighten awareness of the risk of slavery and human trafficking within ongoing development projects.

### **Procurement and supply chain monitoring**

We use Safety Systems in Procurement (SSIP) prequalification schemes to ensure all our contractors have been appropriately vetted for health and safety and other ethical matters and have incorporated reference to our Supplier Code and Sustainability Policy in all new development and facilities management contracts.

Independent Labour Practice Audits are undertaken at our construction sites with a value of over £5 million and unannounced site visits are undertaken of our cleaning contractors to monitor payment of the London Living Wage.

During the year ended 31 March 2018:

- Independent Labour Practice Audits were rolled out for all our active construction sites over £5 million, raising awareness of our commitment to eradication of slavery and human trafficking from our supply chain. This process includes a feedback mechanism where potential improvements to welfare conditions were identified.
- We joined "BuildingConfidence", the Achilles pre-qualification platform for contractors to improve contractor vetting.
- Unannounced visits were undertaken for a number of our cleaning contracts to review payment of London Living Wage and to undertake annual ethics audits.
- A review found that due to licensing procedures, and our current monitoring of the implementation of those procedures, our security contractors did not need to be classified as higher risk suppliers.
- We undertook a review of our Sustainable Development Brief to include more stringent requirements on ethical procurement processes.
- We launched our long term vision for Sustainability which publicly committed to working with our suppliers to eradicate Modern Slavery from the supply chain

### **Training**

During the year ended 31 March 2018, building on the training programme undertaken during the previous year, a seminar was provided on the risks of Modern Slavery for our organisation. Our community strategy, which includes requirements in connection with modern slavery was communicated to our development, portfolio management and occupier services teams.

Further training will be undertaken during the year ending March 2019 to communicate our updated Sustainable Development Brief which includes more stringent ethical procurement processes. The risks of human trafficking and the Group's related policies are covered as part of our induction process for all new employees with the Head of Sustainability and Company Secretary.

### Ongoing effectiveness

Whilst we have no reason to believe that slavery, forced labour or human trafficking has occurred within our supply chains based on the policies, actions and measures taken above, we will work to consider relevant training and to develop best practice in the prevention and protection of slavery, forced labour and human trafficking within our supply chain. During the year ending 31 March 2019 we will:

- continue our auditing programme for our construction projects and cleaning contractors;
- carry out a review of our initial modern slavery risk assessment and supply chain mapping to consider whether further auditing may be required;
- launch our updated Sustainable Development Brief which includes more stringent requirements on ethical procurement processes; and
- undertake refresher training for our employees.

Approved by the Board and signed on its behalf on 20 September 2018 by

Toby Courtauld  
Chief Executive  
Great Portland Estates plc

Toby Courtauld  
Director  
Pontsarn Investment Limited

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