

Slavery and Human Trafficking Statement 2019

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 ('the Act') and covers the activities of Great Portland Estates plc ('GPE') and all the Group's subsidiaries including Ponstarn Investment Limited ('PI'). The Company supports Article 4 and more generally, the principles of the UN Universal Declaration of Human Rights.

Our business

GPE is a property and development company owning, managing and developing real estate solely in central London through its joint ventures and subsidiaries including PI and those referenced on page 5. Whilst our statement applies to all subsidiaries listed, only GPE and PI have a turnover high enough to qualify for the Act.

In March 2019 The Group owned £2.6 billion of property and employed 107 direct employees. All our direct employees are paid in excess of the London Living Wage and are based either at the Group's head office or at buildings within the portfolio. Our portfolio consists of commercial and residential property located within London.

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. Our policies consider working hours, payroll and right to work. In addition, we have the following policies in place:

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

These policies, in addition to our Slavery and Human Trafficking Statement, are communicated to all employees through our new employee induction process and are accessible to all employees on our Intranet. Compliance with these policies is monitored by the Human Resources and Company Secretarial teams.

Our supply chain

Our business model requires us to work with diverse suppliers to develop and operate our portfolio. Our supply chains are complex, they include direct suppliers such as advisors, consultants and maintenance contractors and indirect suppliers who may be subcontracted to Principal Contractors, or supply the materials used to construct or refurbish our buildings.

We recognise the importance of working with our suppliers and our responsibility for seeking to ensure, through due diligence and risk management activities, that there is no slavery, forced labour or human trafficking within any part of our business or in our supply chains.

Wherever possible, we encourage our suppliers to raise any concern with their usual point of contact at the Company. Alternatively, we have a formal whistleblowing policy which can be found [here](#).

Our risk assessment, which we reviewed during the year, identified that our highest risks remained within our construction and refurbishment activities, both on-site labour and within the supply chains involved with the procurement of materials for our projects. Supply chains associated with this work can often include a number of tiers, making transparency more challenging.

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, the high turnover of personnel involved and the use of agency workers in those industries.

We communicate with our supply chain in a number of ways:

- Through our strategies – “Creating Sustainable Spaces”, our Long Term Vision and “Creating Sustainable Relationships” – our Community Strategy
- Through our policies and design briefs – including our Sustainability Policy, our Supplier Code of Conduct and Sustainable Development Brief
- Through requirements set out in our building and facilities management contracts
- Through formal team meetings and on-site auditing
- Via our website
- Through our contractors

Policies and supply chain due diligence for the year ended 31 March 2019

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 promotes the responsible sourcing of both labour and materials.

Our Community Strategy commits to working with our contractors to eradicate modern slavery and addresses measures such as training, awareness, payment of the London living wage and encourages membership of the Living Wage Foundation

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 main 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. Whilst the audits undertaken have not to date identified modern slavery, the results have been provided to the contractors and subcontractors concerned and used to improve working conditions for the labour force employed at our buildings. Additionally, where applicable, the findings have informed revisions to our Sustainable Development Brief and Community Strategy and will be incorporated within the review of our Supplier Code of Conduct.

During the year ended 31 March 2019:

- We continued to undertake independent Labour Practice Audits at 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 are identified. 100% of relevant sites were audited and no modern slavery issues were identified.
- We reviewed our supply chain to ensure that all relevant main contractors are accredited to an appropriate SSIP, 100% of all contractors are accredited.
- We continued unannounced visits for our cleaning contracts to review payment of London Living Wage and to undertake annual ethics audits. 100% of our Facilities Management contractors (cleaning, security and reception) are members of the Living Wage Foundation
- We implemented our revised Sustainable Development Brief which includes more stringent requirements on ethical procurement processes.
- We increased the number of quarry site visits undertaken by our project management team to verify the origin of stone used at our developments. Site visits were undertaken in connection with all active sites during the year.
- We undertook a review of our initial modern slavery risk assessment and supply chain mapping and whilst the risk assessment remains valid, we are now reviewing the implementation of higher standards in connection with contractor accreditation and materials sourcing to drive awareness and improve transparency of supply chains.

Training and awareness

During the year ended 31 March 2019, in order to improve awareness, we incorporated the risks of modern slavery into our employee induction programme and sponsored a touring arts production that depicts modern slavery in construction.

Further refresher training will be undertaken during the year ending March 2020

Ongoing effectiveness

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. However, we continue to evaluate our processes and our supply chains to further best practice in the prevention and protection of slavery, forced labour and human trafficking.

During the year ending 31 March 2020 we will:

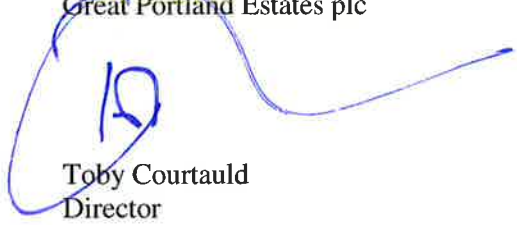
- continue our auditing programme for our construction projects and cleaning contractors;

- undertake refresher training for our employees
- update our Supplier Code of Conduct
- introduce a whistleblowing helpline
- look to implement the BRE Ethical Labour Sourcing standard
- review main contractor accreditation standards to ensure that they reflect the risk profile of the contractor concerned
- undertaken an exercise to improve the transparency of our supply chains in connection with materials procurement for our development projects.

Approved by the Board and signed on its behalf on 19 September 2019 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.

List of Great Portland Estates plc's joint ventures and subsidiaries

73/77 Oxford Street Limited
80 GPS Management Company Limited
Collin Estates Limited
Courtana Investments Limited
G.P.E. (Bermondsey Street) Limited
G.P.E. (Hanover Square) Limited
G.P.E. (Marcol House) Limited
G.P.E. (Newman Street) Limited
G.P.E. (Rathbone Place 1) Limited
G.P.E. (Rathbone Place 2) Limited
G.P.E. (Rathbone Place 3) Limited
G.P.E. (St Thomas Street) Limited
G.P.E. Construction Limited
GPE (Brook Street) Limited
GPE (GHS) Limited
GPE Pension Trustee Limited
Great Capital Partnership (G.P.) Limited
Great Capital Property Limited
Great Portland Estates plc
Great Portland Estates Services Limited
Great Ropemaker Partnership (G.P.) Limited
Great Ropemaker Property (Nominee 1) Limited
Great Ropemaker Property (Nominee 2) Limited
Great Ropemaker Property Limited
Great Victoria Property (No. 2) Limited
Great Victoria Property Limited
Great Wigmore Property Limited
GWP Duke Street Limited
GWP Grays Yard Limited
J.L.P. Investment Company Limited
Knighton Estates Limited
Pontsarn Investments Limited
Portman Square Properties Holdings Limited
Portman Square Properties Limited
Rathbone Square No.1 Limited
Rathbone Square No.2 Limited
The City Place House Partnership (G.P.) Limited
The City Tower Partnership (G.P.) Limited
The Great Star Partnership Limited
The Great Victoria Partnership (G.P.) Limited
The Great Victoria Partnership (G.P.) (No. 2) Limited
The Great Wigmore Partnership (G.P.) Limited
The Rathbone Place Partnership (G.P.1) Limited
The Rathbone Place Partnership (G.P.2) Limited

The Great Capital Partnership
The Great Ropemaker Partnership
The Great Victoria Partnership
The Great Victoria Partnership (No.2)
The Great Wigmore Partnership
The Rathbone Place Limited Partnership
GHS (GP) Limited
GHS (Nominee) Limited
Great Portland Estates Capital (Jersey) Limited
Marcol House Jersey Limited
The GHS Limited Partnership