GREAT PORTLAND ESTATES

Slavery and Human Trafficking Statement 2020

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 Pontsarn Investments 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 commercial and residential 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 2020, the Group owned £2.6 billion of property and directly employed 116 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 our occupied buildings within the portfolio.

Our business model requires us to work with diverse suppliers to develop and operate our portfolio. Our supply chains are complex with over 2,800 suppliers: these 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.

Our policies

We have a number of policies in place that protect our employees and those working on our behalf in our supply chain. In addition to policies which consider working hours, payroll and the right to work, we have the following policies in place:

- Equal opportunities, harassment and bullying Policy
- Ethics Policy
- Whistleblowing Policy
- Sustainability Policy
- Health and Safety Policy

These policies, in addition to our Slavery and Human Trafficking Statement, are communicated to all employees through our new employee induction process, or when there is a material change, and are accessible to all employees on our Intranet. Compliance with these policies is monitored by the Human Resources, Company Secretarial, Sustainability and Health & Safety teams.

Our supply chain

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.

We set out and communicate our expectations with our supply chain in a number of ways:

- our Supplier Code of Conduct sets out the standards that we require of our suppliers and specifically addresses involuntary, forced, human trafficked or slave labour including indentured, bonded and child labour;
- under our Sustainability Policy, we expect our suppliers to review their own activities and their supply chains to ensure that products and services used are from responsible suppliers;
- our Sustainable Development Brief for all developments and major refurbishments sets out our 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.

- 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.

Additionally:

- 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;
- 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. We also meet regularly with our main contractors to share information on industry best practice about health and safety and responsible sourcing.

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

Through our modern slavery and trafficking risk assessment, which is subject to ongoing review, 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 direct employees in our business is low.

Our risk assessment 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.

Supply chain monitoring and due diligence for the year ended 31 March 2020:

- we continued to 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;
- we continued to undertake independent Labour Practice Audits at all our active construction sites over £5 million (construction costs), raising awareness of our commitment to the eradication of slavery and human trafficking from our supply chain. Though no modern slavery issues have been identified, this process includes feedback to contractors to strengthen controls and potential improvements to welfare conditions that can be implemented as appropriate. Due to the COVID-19 pandemic, planned worker engagement audits needed to be postponed at two of our developments. The audit programme will recommence for the year ending 2021.
- we launched Safecall, our confidential whistleblowing hotline and displayed information at each of our construction sites;
- we sponsored poster campaigns at all of our construction sites to provide information on modern slavery and human rights;
- monitoring was undertaken to ensure that 100% of our contractors remained accredited by an appropriate SSIP;

- our policy of ensuring that all our Facilities Management contractors are members of the Living Wage Foundation remained in place and unannounced visits for our cleaning contracts to review payment of the London Living Wage were undertaken, with no issues of concern identified.
- we implemented our revised Sustainable Development Brief which includes more stringent requirements on ethical procurement processes;
- we continued to undertake quarry site visits to verify the origin of stone used at our developments. Site visits were undertaken in connection with all active sites during the year; and
- we continued our review of our 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 2020 we provided initial training on the risks of modern slavery within our employee induction programme for all new joiners.

We also established a COVID-19 Community Fund with contributions from the members of the GPE Board of Directors and Executive Committee and the wider GPE team. Modern slavery causes were identified as a recipient of funds due to the perceived heightened risk of modern slavery within high risk industries as a result of the COVID-19 pandemic.

Ongoing refresher training is being provided throughout the year ending March 2021.

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.

We had no reports to our confidential helpline involving modern slavery concerns.

During the year, as part of ongoing due diligence we identified a gap in the auditing procedures of the Principal Contractor at one of our construction sites, where an employment agency had not been sufficiently vetted for ethical labour practices. We instructed the Principal Contractor to undertake a thorough review of the agency concerned, and whilst remedial actions were identified to improve labour sourcing processes, no evidence of modern slavery was found.

During the COVID-19 pandemic, construction was paused at our live sites until additional arrangements could be implemented to protect worker health and safety in line with government guidance. Our Project Managers undertook regular site visits to view the measures in place, which also supported ethical labour standards given the potentially higher risk of modern slavery during the pandemic.

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

During the year ending 31 March 2021 we will:

- continue our auditing programme for our construction projects and cleaning contractors;
- refresh our training and awareness programme to ensure that all employees with procurement responsibilities and those responsible for supplier monitoring have received refresher training conducted by an external party. We will also extend our awareness programme to our main contractors and provide training where appropriate;
- update our Supplier Code of Conduct to include due diligence further down the supply chain and ongoing supplier monitoring;
- establish appropriate key performance indicators to track progress moving forward;
- further encourage our contractors to consider the use of the BRE Ethical Labour Sourcing Standard or an equivalent;
- review main contractor accreditation standards to ensure that they reflect the risk profile of the contractor concerned;

- Undertake an exercise to improve the transparency of our supply chains relating to the materials procured for our development projects. This detailed sourcing information will help to minimise both ethical and environmental risks.

Approved by the Board of Great Portland Estates plc and signed on its behalf on 17 September 2020 by:

Toby Courtauld
Chief Executive
Great Portland Estates plc

Approved by the Board of Pontsarn Investments Limited and signed on its behalf on 17 September 2020 by:

Toby Courtauld
Director
Pontsarn Investments Limited

List of Great Portland Estates plc subsidiaries and joint venture entities

[73/77 Oxford Street 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]