

## **GPE Modern Slavery and Human Trafficking Statement 2023**

This statement is made pursuant to section 54 (1) 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 statement is made in respect of the financial year ended 31 March 2023.

The Company recognises and supports Article 4 and more generally, the principles of the UN Universal Declaration of Human Rights and core conventions of the International Labour Organisation.

This statement explains the activities we have undertaken during the year to demonstrate our commitment 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.

### **Our business**

GPE is a property investment 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.

At financial year end 31 March 2023, the Group owned £2.4 billion of property and directly employed 139 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 our investment portfolio.

Our business model requires us to work with diverse suppliers to develop and operate our portfolio. Our supply chains are complex, with over 1,600 suppliers: these include direct suppliers such as advisors, consultants and maintenance contractors and indirect suppliers which 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 which consider working hours, payroll and the right to work that protect our employees and those working on our behalf in our supply chain.

In addition, we have the following policies in place in regard to the Company's customers, employees, supply chain partners, investors, joint venture partners, communities, and local and national Government:

- our Equal Opportunities, Harassment and Bullying Policy;
- our Ethics Policy, which defines how we strive to apply our values and related behaviours to the process of doing business;
- our Whistleblowing Policy, which is designed to provide guidance to those who work with or for us to raise certain issues with someone in confidence;
- our Sustainability Policy, which sets out how we will operate in a responsible and sustainable manner;
- our Health and Safety Policy, which details how we accept our responsibility for securing the health, safety and welfare of those working at or visiting areas over which we have control, and others affected by our activities; and
- our Anti-Fraud, Bribery & Corruption Policy, which sets out our commitment, responsibilities, and expectations on those working for us in the prevention, detection and reporting of corrupt practices.

These policies, in addition to our Slavery and Human Trafficking Statement, are communicated to all employees through our new employee induction process and when there is a material policy change, and they are accessible to all employees on our Intranet. Compliance with these policies is monitored by the Health & Safety, Human Resources, Legal and Company Secretarial and Sustainability 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 [Social Impact Strategy](#) advocates for responsible business practices to enable our supply chain to make a positive impact; and
- our [Creating Sustainable Spaces Brief](#) applies to all of our spaces regardless of size or scope. It sets out our requirements for the responsible sourcing of materials, in particular, the usage of Forest Stewardship Council certification with its inclusion of aspects in connection with labour human rights for communities and forest workers. It also incorporates relevant aspects of our Social Impact Strategy including for the provision of Ethical Employment Audits and anti-modern slavery training and awareness programmes.

Additionally:

- when engaging any new contractor, we complete a competency check to ensure the contractor has the required health and safety provisions and controls in place for their workforce;
- we support the objectives of the Gangmasters and Labour Abuse Authority's Construction Protocol, which was established to eradicate slavery and labour exploitation in the building industry. These objectives have been reflected in our own processes and procedures;
- 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; and
- 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](#), and provide a confidential whistleblowing hotline, operated by an independent third party, through which contractors and their workers can raise concerns on an anonymous basis.

## **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 several tiers, making transparency more challenging.

We do however recognise the way in which our business operates, as a building owner and operator, includes service partners that sit outside of our construction and refurbishment activities. These include services such as security, landscaping and cleaning. Within our investment 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.

Unseen, the UK based charity that provides safehouses and support in the community and which runs the UK Modern Slavery & Exploitation Helpline, highlighted Services and Construction as being two of the four most prevalent industries indicated in labour exploitation situations reported to it in 2022 in terms of both numbers of cases and potential victims. Unseen reported a 225% increase in cases related to the Services sector in 2022 compared to 2021.

## **Supply chain monitoring and due diligence for the year ended 31 March 2023:**

- our Sustainable Development Brief evolved into our Creating Sustainable Spaces Brief, and as part of that process we improved transparency from suppliers regarding the procurement processes for the materials purchased on our behalf and used on our projects, as well as setting out clear social sustainability KPIs;
- as focus on our Fully Managed product increased during the year, we worked with our refurbishment and fit-out contractors to support them in understanding our anti-modern slavery practices;
- we enhanced our labour practice audit programme to ensure that both the demolition and construction phases of projects are audited due to the different risk profile of these activities;
- 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 of Conduct and Sustainability Policy in all new development and facilities management contracts;
- we continued a programme of Ethical Site Surveys at our active construction sites in partnership with our Principal Contractors, raising awareness of our commitment to the eradication of slavery and human trafficking from our supply chain;
- our strategic construction partners delivered a number of initiatives within our value chain which included partnering with modern slavery charities, Hope for Justice and Unseen, to deliver both awareness and education exercises on site, as well as running gap analysis audits of their own procurement procedures. These initiatives have led to much greater transparency in the supply chain, improved policies and procedures, and broader understanding of ethical labour practices;
- we continued the use and promotion of our confidential whistleblowing hotline, Safecall, at our active construction sites, investment portfolio and within GPE's Head Office;
- monitoring was undertaken to ensure that 100% of our contractors remained accredited by an appropriate SSIP scheme;

- our service partners continued to pay the London Living Wage for all their employees working in our buildings and we are working with our construction contractors at our developments to support the continued roll-out of the London Living Wage through their supply chains;
- we continued to embed our new Anti-Fraud, Bribery and Corruption Policy setting out our expectations of those working for us in the prevention of corrupt practices, including in relation to staff training; and
- we remain a member of a cross industry working group that launched the Achilles Ethical Business programme which assesses ethical employment practices.

### **Training and awareness**

Ongoing training forms a key part of our commitment to eradicate modern slavery. We continued to provide initial training on our policies and the risks of modern slavery within our employee induction programme for all new joiners. In 2021/22, we partnered with Unseen, a modern slavery charity and provider of the Modern Slavery Helpline, to deliver bespoke training to the GPE team for individuals with procurement responsibilities.

### **Ongoing effectiveness**

It remains that 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.

Our Labour Practice Audit programme, and those carried out by our Tier One supply chain, identified opportunities to strengthen controls in certain areas of procurement, site management and employee inductions.

Our Project Managers, and Health & Safety team, continue to undertake regular site visits focused on the health and safety, sustainability and ethical labour practice measures that are in place, holding our supply chain to account but also ensuring GPE processes and procedures are in place to minimise and mitigate key risks.

We take an approach of continuous improvement to evaluate our processes and our supply chains to further strengthen our ability to prevent modern slavery, forced labour and human trafficking.

During the year ending 31 March 2024 we will:

- undertake a risk mapping and gap analysis exercise against our supply chain processes and work with a third party ethical labour specialist to identify the appropriate steps for improvement;
- continue our auditing programme for our construction projects and service partners;
- deliver further engagement activities in collaboration with our value chain, targeting impactful education and awareness through initiatives such as Anti-Slavery Day in October 2023 and;
- review our awareness training and controls, to ensure that they remain relevant to the level of risk;
- strengthen key performance indicators to support improved management of risks connected with modern slavery;
- work with our Principal Contractors on accreditation standards (e.g. SSIP scheme) to ensure that they reflect the risk profile of the supply chain;
- undertake further initiatives to improve the transparency of our supply chains relating to the materials procured for our development projects.

Approved by the Board of Great Portland Estates plc and signed on its behalf on 21 September 2023  
by:

A handwritten signature in black ink, appearing to read 'Toby', with a long horizontal flourish extending to the right.

Toby Courtauld  
Chief Executive  
Great Portland Estates plc

Approved by the Board of Pontsarn Investments Limited and signed on its behalf on 21 September  
2023 by:

A handwritten signature in black ink, appearing to read 'Toby', with a long horizontal flourish extending to the right.

Toby Courtauld  
Director  
Pontsarn Investments Limited

**List of Great Portland Estates plc subsidiaries and joint venture entities as at 31 March 2023**

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  
GPE St Andrew Street Limited  
GPE (Dufour's Place) 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  
Gresse Street 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 Great Victoria Partnership (G.P.) Limited  
The Great Victoria Partnership (G.P.) (No. 2) Limited  
The Rathbone Place Partnership (G.P.1) Limited  
The Rathbone Place Partnership (G.P.2) Limited  
The Great Ropemaker Partnership  
The Great Victoria Partnership  
The Great Victoria Partnership (No.2)  
The Rathbone Place Limited Partnership  
GHS (GP) Limited  
GHS (Nominee) Limited  
Marcol House Jersey Limited  
The GHS Limited Partnership  
14 Brook Street Management Company Limited