

Modern Slavery Statement

11 July 2024

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1. Introduction

At Landsec, we strive to connect communities, realise potential and deliver sustainable places. We create places that make a lasting positive contribution to our communities and our planet. We bring people together, forming connections with each other and the spaces we create. And we provide our customers, partners and people with a platform to realise their full potential.

Approximately 122,000¹ people are currently in modern slavery in the UK, placing it among the countries with the lowest prevalence of modern slavery. The construction sector however ranks as one of the higher risk industries for prevalence of adult forced labour², therefore as a real estate company who designs, builds and operates buildings in the UK, we support the UK government in its drive to end modern slavery. As such we continue to take action to ensure that this is not taking place in our business or supply chain.

This statement is published in accordance with the Modern Slavery Act 2015, with reference to the Ethical Trading Initiative's Modern Slavery Statements Evaluation Framework. It describes the risks of slavery in our business and supply chain and how we respond to those risks through the policies, processes and actions that Landsec has undertaken to date and especially since our previous statement made in July 2023. Our statement is published annually at Landsec.com and disclosed on the Modern Slavery Statement Registry³.

During 2023/24 two whistleblowing incidents were reported, neither of which related to modern slavery. Both matters were investigated, and no concerns or action were required following conclusion of the investigation. As of date of statement publication no incidents of modern slavery have been identified or reported in our business or supply chain.

2. Our business structure and our supply chain

We are one of the leading real estate companies in the UK. We develop, own, and manage some of the most memorable real estate in the UK. Our £10.0 billion portfolio spans 22.8 million sq ft (as of 31 March 2024) and consists of high-quality offices in London, six regional shopping centres, three retail outlet centres and a portfolio of mixed-use urban development opportunities in London, Manchester and Glasgow.

2.1 Our employees

Landsec directly employs approximately 600 people across the UK (as of 31 March 2024). These employees fulfil a variety of real estate related roles across client facing, commercial, marketing, operational, development, ESG, procurement, risk and compliance. We employ people on a variety of contracts from permanent to fixed term and contingent workers. All of these are subject to pre-employment checks which includes a right to work check. All direct employees receive an offer letter and contract.

¹ <https://www.walkfree.org/global-slavery-index/findings/regional-findings/europe-and-central-asia/>

² <https://www.ilo.org/media/370821/download>

³ <https://modern-slavery-statement-registry.service.gov.uk/>



This year we undertook a significant re-tender of our facilities management providers across our Workplace and Lifestyle businesses, onboarding our new service partners in April 2024. As part of this process, 47 employees have been brought into Landsec, which will support management and coordination of facilities management providers. This structure will also help us to monitor and manage modern slavery risks, with all new employees undertaking Modern Slavery training as part of their onboarding process.

2.2 Our supply chain

Our business model of developing and operating properties relies on a network of suppliers who provide goods and services to us. We recognise that our supply chain is critical to the success of our company, ensuring we are delivering our purpose and have a positive societal and environmental impact alongside delivering value for money. We're committed therefore to developing long-term, mutually beneficial and trust-based partnerships with suppliers whose values and cultures align with ours.

In particular we work with:

- Service partners and managing agents who manage our buildings including providing security, cleaning and waste management services. All these suppliers are UK-based, but there is a risk of modern slavery due to the inherent nature of the work and the diversity of the labour force employed.
- Main contractors on the construction of our new developments and refurbishments where we rely on them to resource the projects and purchase the materials often through their supply chains. Some of these materials may be sourced from countries with less stringent labour practices and employment laws than the UK.

We've identified 99 of our suppliers as strategic, defined as suppliers that if their business fails, our business fails. 41% of our spend in 2023/24 was with our strategic suppliers.

3. Governance

Modern slavery is managed in accordance with our governance for sustainability and risk management. The Board is accountable for our approach to sustainability, including modern slavery. Our Executive Leadership Team are responsible for setting our sustainability strategy ensuring we identify, prioritise and manage our risks. Our Sustainability Forum is responsible for executing the strategy and delivering actions needed to address our relevant modern slavery risks in collaboration with each of our business unit leadership teams.

Our approach to tackling modern slavery is supported by our Modern Slavery Working Group, which is comprised of representatives from our risk, procurement, sustainability and company secretary teams and meets on a quarterly basis.



4. Policies

We ensure all our employees and the suppliers we have identified as having a higher risk of Modern Slavery, as outlined above in 2.2, are aware of and comply with our policies and guidance documents relating to modern slavery which form a contractual commitment and are regularly refreshed to ensure they are industry leading. This includes our Speak Up Policy and procedure to ensure that anyone working on our behalf can raise concerns about any of Landsec's business activities.

This year we updated our Human Rights Policy to reflect our commitment to tackling modern slavery and ensuring victims are supported through our remediation process.

<u>Human Rights and modern slavery Policy</u>	Our Human Rights and Modern Slavery Policy demonstrates how we are committed to respecting human rights in accordance with the UN Declaration of Human Rights. It sets out our core principles and states our expectation that everyone working on our behalf be treated fairly and with respect.
<u>Supply Chain Commitment</u>	Our Supply Chain Commitment sets out our requirements of how we will conduct business in an open, honest and transparent manner, and the behaviours and practices we expect of our suppliers and partners, including a commitment to prevent modern slavery in all its forms within our business activity.
<u>Speak up Policy</u>	Our Speak Up Policy sets out how Landsec employees or anyone working on our behalf can report concerns about suspected impropriety or wrongdoing in confidence and anonymously. If any modern slavery concerns were to be raised, we would investigate thoroughly.
<u>Employee Code of Conduct</u>	Our Employee Code of Conduct sets the overall ethical framework for everything we do and provides guidance to our employees on how to do the right thing and behave in the right way. It also highlights the key policies that all employees must follow. It shows us how we should come together as an organisation and as individuals to deliver our purpose by nurturing the right behaviours and culture.
<u>Materials Brief</u>	Our Materials Brief provides clear guidance for our design partners, to ensure human rights risks are designed out through the material selection process. The list sets out high risk material types and locations for extraction and manufacture, and is based on robust data sources including the Global Slavery Index and the Ethical Trading Initiative. It also explicitly requires our Tier 1 suppliers to ensure care and attention in the selection, sourcing and supervision of Tier 2 suppliers.
<u>Right to Work Policy</u>	Our Right to Work Policy is intended to provide best practice guidance to those assigned responsibility in performing right to work checks across our supply chain.

5. Our modern slavery risk

Owing to our size, UK-based location and the nature of our Landsec direct employees, the inherent risk of modern slavery in the recruitment and engagement of employees is considered to be low. However, we recognise that modern slavery and forced labour does occur in the real estate, facilities management, and construction industries across the world and that there is a proportionately higher risk of modern slavery in our supply chain.

Over 96% of all our suppliers are based in the UK, with none of them located in countries that have a high prevalence of modern slavery as defined by the 2024 Global Slavery Index⁴. Our construction suppliers source a broad variety of components and materials from companies all over the world on

⁴ [World | The Global Slavery Index \(walkfree.org\)](https://www.walkfree.org/)



our behalf. Whilst these goods are not sourced directly by us, we specify common materials to be used on all our development and portfolio projects and list all prohibited materials within our Materials Brief.

To better understand where the risk of modern slavery across our supply chain is higher, we also group our strategic suppliers into categories of spend and apply an overall risk rating to each category against each of the eight themes within our Supply Chain Commitment. Of our 99 strategic suppliers, we've identified 21 as higher risk of modern slavery due to them being in the construction and site services (e.g. facilities management) categories of spend. It is these suppliers where we will prioritise our modern Slavery training and checks.

5.1 How we are addressing modern slavery risk

5.1.1 Employee onboarding and recruitment

All colleagues receive an offer letter and contract detailing the terms and conditions of their employment and a comprehensive range of background checks are undertaken on all potential employees prior to employment. We consult and communicate with colleagues through a range of channels including our Employee Forum and Affinity Network Groups. We also require employees to comply with our Employee Code of Conduct. In addition, all employees have the right to join a union however we don't formally recognise any particular one, due to the diverse nature of real estate roles and professions of our employees. All directly employed staff are paid the Real Living Wage or above.

5.1.2 Supplier engagement and due diligence

From construction to cleaning, we work with suppliers that share our values and help us to achieve the highest standards in our supply chain. As a minimum, we expect all our suppliers to comply with all applicable local laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically, and using environmentally responsible practices where practicable.

When onboarding new suppliers, we carry out a questionnaire to assess and review what suppliers' processes are to identify their own modern slavery risks and what mitigation and remediation procedures they have in place. Where applicable this includes reviewing their modern slavery statement and relevant policies. We also ask our suppliers to sign up to our Supply Chain Commitment which commits our suppliers to preventing modern slavery in all its forms across our supply chain and requires adherence to Landsec's policies. Over 300 suppliers have signed up since we launched the commitment in 2022, which includes almost 80% of our strategic suppliers.

5.1.3 Facilities Management

Our service partners, those that work in our buildings on behalf of us, follow the same recruitment and onboarding processes as Landsec, therefore all employees are issued an Offer Letter and Contract of Employment.

All interested parties during the Future of Facilities tender process were asked to declare if they have had any legal action has been taken against them under the modern slavery act during the very first review of interested parties in the RFI stage. No suppliers stated that any legal action had been taken. In addition, facilities management providers have committed that all employees working across Landsec assets will be paid the Real Living Wage or above.



5.1.4 Development

Our Sustainability Preliminaries are issued to all development suppliers at the start of each project and set out the Contractor's obligations. This includes local sourcing, adherence with our prohibited materials list, and demonstration that the following measures are in place:

- A due diligence process which determines human rights risks in the supply chain, and takes appropriate actions as a result
- A training programme, which is implemented for all relevant decision-makers within the company (including procurement teams) on risks, policies and standards related to modern slavery, human trafficking and forced labour
- A programme to raise awareness of the signs of modern slavery, and information on how to raise complaints within the company for all staff
- A written policy on Human Rights and/or modern slavery
- An anonymous company-wide grievance/whistleblowing mechanism accessible to all staff.

During May 2024 we appointed Achilles to conduct labour practice checks at two of our live developments, Timber Square and Thirty High. A total of 130 workers, 65 on each site, were interviewed on a range of topics including health & safety, fairness and ethics to gauge whether our policies and commitments are hitting the ground. The workers were interviewed on site, in areas of safety, where they could not be overheard by others. No issues relating to modern slavery were identified.

5.1.5 Solar PV suppliers

This year we went out to tender for suppliers to provide and install solar PV across our retail sites. Recognising that the solar industry is particularly vulnerable to forced labour, we ensured that modern slavery due diligence was embedded into the procurement process. This included requiring our suppliers to have modern slavery policies in place and to go beyond policy to demonstrate how they are actively combating modern slavery within their supply chain. We also specified equipment types that we know are not sourced from countries with high prevalence of modern slavery, and that are CE (European Conformity) marked. Furthermore, through the shortlist and interview process, we challenged suppliers to provide robust evidence of the actions their own supply chain are taking to combat modern slavery.

6. Training and capacity building

Through our membership with the Supply Chain Sustainability School (SCSS), we've continued to roll out mandatory modern slavery e-learning to all our colleagues, raising awareness of how to spot the signs and support victims and how to report a concern. Since launch in May 2023, over 500 colleagues have completed the training, which includes 73% of current employees. All new starters are required to complete the training as part of our employee onboarding process. This year we have also run modern slavery workshops for colleagues in our Procurement, Development and Operations teams, providing an overview of how to identify the signs of slavery across our business activities and a range of tools to help report and tackle modern slavery. Landsec is a gold-badge member of the School due to our high usage of their resources.

To support our suppliers in meeting our commitments, we've partnered with our contractors working on our developments highlighting the benefits of the Supply Chain Sustainability School and



encouraged them to complete modern slavery, carbon and climate and leading people inclusively training modules. We've also rolled modern slavery training out to our supply partners running a workshop for our development suppliers and two workshops for our FM partners. These workshops provided an overview of the Modern Slavery Act 2015, information on how to identify the signs of slavery within the supply chain and a range of tools and resources to help tackle modern slavery.

7. Goals for the year ahead

To continue our progress and ensure that our Supply Chain Commitment is embedded across our business and our supply chain, our focus for the year ahead includes:

- Continue to roll out modern slavery training to colleagues, development suppliers and facilities management partners
- Engage colleagues on our approach to modern slavery remediation, ensuring everyone knows what to do if modern slavery is found
- Review and update our Supply Chain Commitment to ensure it remains relevant and continue engaging our strategic suppliers to sign up
- Enhance our risk-based framework and process for monitoring compliance (KPIs) against our Supply Chain Commitment

We will measure progress annually, reporting updates in our 2025 Modern Slavery Statement.

8. Approvals

This is our ninth Modern Slavery Statement ("Statement") made pursuant to Section 54 of the Modern Slavery Act 2015 'Transparency in Supply Chains' ("Act"). The Statement relates to Land Securities Group PLC ("Landsec" or "the Company") and its subsidiaries and is made in respect of its financial year ended 31 March 2024. It sets out the steps Landsec has taken, and is proposing to take, to address the risk of modern slavery in our business and within our supply chain. For the purposes of this Statement, the Company's joint venture arrangements (where we are responsible for the operations of such arrangements) are treated as being part of our supply chain. This statement was approved by the Board on 11th July 2024.

Mark Allan

Chief Executive Officer On behalf of Landsec

11th July 2024