



The British Land Company Plc ("British Land") – Slavery and Human Trafficking Statement 2018

Modern slavery and human trafficking are grave forms of human rights abuses. British Land recognises the importance of respecting human rights and has been a signatory to the UN Global Compact since 2009. Respecting human rights is part of our [2020 Sustainability Strategy](#) and we are committed to taking steps to prevent modern slavery and human trafficking in our business and our supply chain.

This is our third annual slavery and human trafficking statement ("Statement") pursuant to section 54(1) of the Modern Slavery Act 2015 (MSA). This Statement sets out the steps we have taken during the financial year ended 31 March 2018, as well as the activities we have started to take, to prevent modern slavery and human trafficking in our business and our supply chains. This Statement covers The British Land Company Plc ('British Land') as well as our wholly owned subsidiaries and those joint ventures and funds managed by us. In addition, our property management subsidiary Broadgate Estates publishes its own Statement, which is available at: <https://www.broadgateestates.co.uk>

About British Land

British Land owns and manages a high-quality portfolio of commercial property in the UK. At 31 March 2018, the portfolio was valued at £18.2 billion¹ (British Land's share is £13.7 billion) and provides exposure to a broad mix of uses.

As a group we operate through wholly owned subsidiaries, joint ventures or funds. Around half our managed assets¹ by value are in joint ventures or funds. In the majority of our partnerships, we provide asset management, development, corporate and financial services and we earn performance and management fees. British Land-managed joint ventures and funds all operate in line with our policies.

British Land has 230 direct employees (as at 31 March 2018), all of whom are paid at or above the Real Living Wage. Our supply chain consists of approximately 1,700 direct suppliers. Our total spend with these third parties amounted to £605 million in FY18. Over half was spent on construction related costs and the remainder on property related and company running costs.

Our policies

We have policies in place to protect our employees and their labour rights in our operations including policies around working hours, payroll, and Right to Work checks. Compliance with these policies is monitored by the Human Resources team and updates are made on an ad-hoc basis when there are changes in employment law. British Land's Human Resources Director is responsible for these policies. Development and implementation of these policies is led by the Head of Employee Relations.

Our Sustainability Policy documents our commitment to treat our staff and suppliers with fairness, dignity and respect, and to support the protection of internationally recognised human rights. The [Sustainability Policy](#) is available on our external website and on our employee Intranet. This policy was approved by the Board of British Land.

On joining the Company, each employee is provided with our Employee Handbook which sets our expectation that our employees maintain high standards when it comes to ethical business conduct, and a requirement that our relationships with competitors, suppliers and clients must be based on high standards of personal and professional ethics.

Our Employee Handbook also describes our confidential whistleblowing channel, which employees and third parties can use to report any concerns of unethical behaviour. Employees are also reminded,

¹ Includes 100% of the assets owned by the Group's joint ventures and funds.

through internal communications, that they have a role to play in preventing modern slavery and human trafficking in our business and supply chain and are encouraged to discuss the importance of ensuring fair and safe working practices and also report possible signs of modern slavery and trafficking through the whistleblowing channel. Our [Whistleblowing Policy](#) is also available on our external website and suppliers are advised to raise any concerns through the whistleblowing channel ([Suppliers – British Land](#)).

Our risk areas

Our real estate portfolio is located entirely in the UK and our employees are primarily office-based professionals, putting them at low risk of modern slavery or human trafficking.

We consider people within our supply chain to be at higher risk and manage this through our procurement function. The professionalisation of this function is enabling us to improve supply chain standards and transparency, particularly through the application of greater due diligence during the supplier onboarding process.

Within our supply chain we believe there to be three specific areas of high risk, namely the procurement of specific materials, fair treatment of workers on construction sites and sourcing of labour services in relation to property management activities.

Reducing risk in our supply chain

Our supply chain is broad and includes direct suppliers (e.g. legal advisors, property managers, construction contractors) as well as indirect suppliers (e.g. cleaning, security, construction materials manufacturers).

We actively communicate our social and ethical standards to all our suppliers via our onboarding process, contracts, Supplier Code of Conduct and supplier events. Through our Sustainability Strategy and related initiatives, we leverage our scale and scope to encourage more responsible supplier behaviours and practices.

In March this year we launched our new [Supplier Code of Conduct](#) which builds on the good practice established through our earlier Supply Chain Charter, which it replaces.

Our new Code sets out our expectations of our suppliers and their obligations in areas such as:

- **Social:** health and safety, child labour, forced labour, working hours, payment, discrimination, freedom of association, right to collective bargaining, community engagement and apprenticeships.
- **Ethical:** conflict of interest, anti-bribery and corruption, fraud and money laundering, whistleblowing and privacy.
- **Environmental:** sourcing of materials, environmental management, air quality and waste management.

As part of our ongoing relationship with our suppliers we ask all suppliers to comply with this code.

All new suppliers are now required to acknowledge their understanding of, and their obligations within, this Supplier Code of Conduct. A breach by a supplier of the Supplier Code of Conduct may be considered a material breach of the supplier's contract with British Land and a supplier shall provide British Land with reasonable access to all relevant information and premises for the purpose of assessing performance against the Supplier Code of Conduct.

Through our tendering and contracting procedures, suppliers are required to uphold the requirements of the Supplier Code of Conduct and ensure any subcontractors they appoint do the same. These obligations are reflected in our contractual documentation, through which we further specify that suppliers must prohibit child labour, forced labour and exclusive zero-hours contracts.

We work with our suppliers to manage the risk of human rights violations in procured labour. All of our UK suppliers are encouraged to pay their UK based employees at or above the Real Living Wage. All three of our London mixed-use campuses (Broadgate, Paddington Central and Regent's Place) are accredited 'Living Wage Employers' by the Living Wage Foundation. Employees (whether they are permanent employees or third-party contractors) at these campuses, receive the London Living Wage.

All development contractors are required to register with the Considerate Constructors Scheme (CCS), a non-profit making organisation designed to encourage best practices in areas including community, environment, safety and workforce. By registering with the CCS the contractors commit to providing a workplace where everyone is respected, treated fairly, encouraged and supported, health and safety of the workforce is cared for, and high standards of welfare is provided and maintained. CCS monitors these commitments through audits. The average score from British Land construction sites in FY18 was 36.9 out of 50, compared to the industry average of 36.11.

We also require key construction suppliers to be certified through Achilles' Building Confidence programme, a UK-based industry scheme that includes audits of the suppliers' social and ethical practices. As of June 2018, 100% of our key construction contractors have signed up to Building Confidence.

We seek sustainability certifications (e.g. BREEAM) on major developments. These certifications include aspects which incentivise responsible sourcing of construction materials, such as management of human rights in the production, transport and assembly of materials. 100% of our development pipeline is on track to achieve a "very good" or "excellent" rating. In 2014 we identified that stone extracted from certain countries brings a high risk in terms of forced and child labour. In response, we aim to source natural stone within the EU, where governance structures to uphold the rule of law are considered strong. In our Sustainability Brief, we require a set of materials to achieve a responsible sourcing standard BES6001, which includes requirements to uphold labour rights in materials manufacture.

To increase transparency of working practices on British Land construction sites, we appointed an independent assessor to complete pilot Labour Practice Audits on two of our sites during FY18. Through one to one interviews with individuals working on site, these explored a range of potential issues and no concerns were identified on these sites with regards to modern slavery. These pilots proved an effective way of gaining assurance regarding actual working practices and we intend to run these audits with every major contractor used by British Land.

The introduction of our new supplier portal has improved our ability to monitor a supplier's compliance to Living Wage, modern slavery and their approach to apprenticeship programmes. The information provided through this process is used to monitor ongoing supplier commitments.

We have also strengthened our internal procedures in relation to procurement by screening and monitoring our supply chain. Anti-Bribery and Corruption related checks are carried out on any new suppliers and the whole supply chain is screened and monitored by a 3rd party specialist company and we are notified if any supplier is matched against a grid monitoring ethical, fiscal, or reputational issues.

Training available to staff

On joining the Company all full time and fixed term contractors receive training on human rights and modern slavery as part of the corporate new employee induction programme. All employees are made aware of the Group's policies and procedures including those on health and safety, anti-bullying and harassment, whistleblowing, anti-bribery and corruption, sustainability, slavery and human trafficking through the employee handbook, internal communications and periodic training as appropriate.

We will continue to raise awareness of modern slavery and human trafficking with employees and contractors to ensure that they are able to identify, and report suspected instances.

Looking ahead

We recognise that responding to an issue as serious as modern slavery and human trafficking requires constant commitment and vigilance. We will continue to seek opportunities to further reduce the risk of human trafficking and modern slavery, increase transparency in our operations and supply chain and respond effectively to risks as they are identified.

We will also continue to manage and report on the performance indicators disclosed in this Statement in order to measure our programme's effectiveness over time.

This Statement was approved by the Board on 16 August 2018.

A handwritten signature in blue ink, appearing to read 'S. Carter', is positioned above the printed name of the signatory.

Simon Carter, Director and Chief Financial Officer
British Land Company PLC