



## **The British Land Company Plc (“British Land”) Slavery and Human Trafficking Statement 2024**

### **INTRODUCTION**

Modern slavery and human trafficking are grave forms of human rights abuse. British Land recognises the importance of respecting human rights and has been a signatory to the UN Global Compact since 2009. We are committed to preventing modern slavery and human trafficking in our business and throughout our supply chain.

This slavery and human trafficking statement (“Statement”) pursuant to section 54(1) of the Modern Slavery Act 2015 (MSA) covers The British Land Company Plc (‘British Land’) as well as our wholly owned subsidiaries and those joint ventures and funds managed by us. Our statement is reviewed and published annually on Britishland.com and disclosed on the Modern Slavery Statement Registry.

At British Land we make responsible choices across all areas of our business. We require our customers, partners and suppliers to do the same within their own businesses.

As of the date of publication, no incidents of modern slavery have been identified or reported in our business or supply chain.

### **ABOUT BRITISH LAND**

British Land is a UK commercial property company focused on real estate sectors with the strongest operational fundamentals: London campuses, retail parks, and London urban logistics. We own or manage a portfolio valued at £13.0bn (British Land share: £8.7bn) as at 31 March 2024.

Some of our managed assets are in joint ventures or funds. In most of our partnerships, we provide asset management, development, corporate and financial services, and we earn performance and management fees. British Land’s managed joint ventures and funds all operate in line with British Land policies.

### **OUR EMPLOYEES**

We are a responsible employer, creating a safe and diverse working environment where people are comfortable to be themselves. This approach is embedded in our company values.

At 31 March 2024, British Land and its subsidiaries had 634 direct employees. Our employees perform a wide range of roles including customer facing property management, asset development, finance, ESG, procurement, marketing and risk and compliance.

All employees are subject to pre-employment checks which includes a right to work check. All direct employees receive an offer letter and contract.

British Land has always paid direct employed staff at least the real living wage. In 2023 British Land became an accredited Living Wage employer which reflects the work the company has done in recent years in encouraging its supply chain to do the same.

### **TRAINING**

On joining British Land, each employee attends a corporate induction that outlines our expectations for ethical business practice including how to conduct relationships with competitors, suppliers and clients

Through regular internal communications and periodic training, 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, preventing slavery and human trafficking. Through these education and training activities we

increase awareness of modern slavery and human trafficking with employees and contractors and ensure that they are equipped to identify, and report suspected instances.

## POLICIES

We have policies in place to protect our employees and their labour rights including working hours, payroll, and Right to Work checks. Compliance with these policies is monitored by the Human Resources team and are reviewed on an annual basis with ad-hoc updates when there are changes in employment law. 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.

British Land provides a confidential professional third-party whistleblowing channel, which employees can use to report any concerns of unethical behaviour. Internal communications make employees aware that they have a role to play in preventing modern slavery and human trafficking in our business and supply chain. All staff must complete the Modern Slavery Awareness training designed to equip our employees with the skills and knowledge to spot early signs of potential issues in this area. Our staff are encouraged to discuss the importance of ensuring fair and safe working practices and to report possible signs of modern slavery and trafficking through the whistleblowing channel. [Our Approach to Whistleblowing](#) is also shared on our external website.

## OUR SUPPLY CHAIN

We value our supplier partners and the contribution they make in delivering our business objectives. We are committed to developing long-term mutually beneficial partnerships with suppliers whose values align with our own.

Our UK based supply chain can broadly be categorised as follows;

- **Service Partners** who provided essential property management services to our occupiers including cleaning and maintenance, security and front of house and waste management. We select Service Partners who operate close to our properties to ensure that we support our local communities.
- **Main contractors** who provide materials and construction workers via a prime contractor model. Their work includes the construction of new developments and refurbishment of existing assets. We work closely with these prime contractors to ensure that our standards are maintained throughout their own supply chains.

We operate a robust and thorough supplier due diligence and onboarding process. All new suppliers are screened before being onboarded, which includes Anti-Bribery and Corruption related checks. On a real time-basis, a third-party specialist organisation screens and monitors our supplier base and we are notified of any ethical, fiscal or reputational issues identified.

We communicate our Social, Sustainable and Ethical expectations through our [Supplier Code of Conduct](#) and we apply these standards across all procurement decisions. All Suppliers are required to sign up to this code as part of the onboarding process.

This Code sets out what we stand for, how we work and the commitments we expect from our Supply Chain in the areas of:

- **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. We advocate the Modern Slavery and Exploitation Helpline to support our people and suppliers.
- **Environmental:** sourcing of materials, environmental management, air quality and waste management.

All suppliers to British Land must acknowledge their understanding of this Supplier Code of Conduct and their obligations within. A breach of this code by a supplier may be considered a material breach of the supplier's contractual arrangements with British Land.

Suppliers must also ensure any subcontractors they appoint uphold the Code of Conduct. These obligations are reflected in contractual documentation, through which we also specifically state that suppliers must prohibit child labour, forced labour and exclusive zero-hours contracts

Suppliers are required to provide British Land with reasonable access to all relevant information and premises for the purpose of assessing compliance against the Supplier Code of Conduct.

Since 2020, we have partnered with Unseen - the UK's Modern Slavery Business Advisory Service. This specialist organisation provides guidance and support for organisations who share their vision of 'a world without slavery'

## **REDUCING RISK IN THE SUPPLY CHAIN**

Through our Sustainability Strategy and related activities, we leverage our scale and scope to engender more responsible supplier behaviour and practices. This is explicitly stated within our 2030 Sustainability Strategy, which highlights the importance we place on responsible business conduct and, specifically, the prevention of modern slavery.

We work with our suppliers to manage the risk of human rights violations in procured labour. In 2023 we became an accredited Living Wage employer which requires all our suppliers to pay their UK based employees at or above the Real Living Wage. As of July 2024, 100% of our suppliers' employees working regularly at our locations were paid the Real Living Wage. This is an improvement from 97% in the previous year.

Our Supplier Risk Monitoring tools and contractual rights to audit have improved our ability to spot early warning signs of poor ethical practice, enabling us to better prevent Modern Slavery violations.

We have continued our Work Practice Audit Programme with Unseen conducting on-site audits with our highest-risk suppliers. These audits provide an effective way of creating transparency into working practices within our supply chain. Through unannounced one to one interviews with individuals, working on site, employed by our contractors, a range of potential issues associated with modern slavery are explored. The audit framework covers the following areas: HR practices including recruitment; reward and people development; equal opportunities; human rights; and health and safety. We require suppliers to achieve a minimum Work Practice Audit (WPA) score of 80%. Any suppliers scoring below this threshold are measured against a tailored WPA improvement plan. Supplier failure to meet our required standards is treated as a breach of contractual terms and necessary action is taken.

In the event that we identified a breach of our supply chain policies or protocols, we would work with the impacted parties to undertake an investigation into the circumstances including root cause analysis and formulation of a remediation plan. The circumstances of the breach, the results of the investigation and any process improvements and enhancements implemented are reported to the Executive Risk Committee and then to the Board Audit Committee and/or the ESG Committee as appropriate, depending on the nature and severity of the breach.

Based on our due diligence and risk assessment methodology we have identified three areas of primary risk classified as 1) material procurement, 2) construction workers 3) property management labour:

### **1. Procurement of specific materials**

We seek sustainability certifications (e.g. BREEAM) on major developments. These certifications incentivise responsible sourcing of construction materials, such as management of human rights in the production, transport and assembly of materials. 100% of our major developments are on track to achieve an "excellent" or "outstanding" BREEAM rating.

We support sustainable sourcing of all materials in our portfolio. Project teams are required to report third party certification and transparent chain of custody, and we carry out audits to ensure compliance.

We require all materials to be sourced from the EU and UK wherever possible, where governance structures to uphold the rule of law are considered strong, and for high-risk materials we require a responsible sourcing standard such as BES 6001 and Cradle to Cradle which includes requirements to uphold labour rights in materials manufacturer.

Our requirements regarding ethical procurement of materials are detailed for our supply chain in our [Sustainability Brief for Our Places and Materials Schedule](#).

Where bespoke materials are specified which do not carry certification, we directly review the suppliers' processes, their approach to environmental, social, and ethical matters and require full documentation regarding the chain of custody.

### **2. Fair treatment of workers on our construction sites**

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 and valuing the 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 a high

standard of welfare is provided and maintained. CCS monitors these commitments through audits. The average score from British Land construction sites in FY24 is 42.7 out of 45 (2023: 41.6), compared to the industry average of 40.5 (2023: 39.9).

We are registered with the Achilles Building Confidence programme, a UK-based industry scheme that includes audits of suppliers' social and ethical practices. We also require key construction suppliers to be certified through Achilles, or the Common Assessment Standard. 100% of our on-site construction suppliers are signed up to this accreditation.

We continue to support suppliers in improving their oversight of appropriate documentation and awareness among their staff of Modern Slavery Policies.

### **3. Procurement of Labour Services in relation to Property Management Services**

The UK based supply chain used in the provision of property management services, particularly cleaners and security guards are included in our Work Practice Audit (WPA) delivered by Unseen. This process supports a safe and open reporting approach to any potential or actual incidents. Results of audits are shared with Service Partners and where necessary corrective action plans put in place. Of the Work Practice Audits conducted over the last 12 months all suppliers met the required audit standards.

We encourage suppliers of these services to employ people who live close to our places. This increases local employment and builds closer relationships with the local communities that host our assets.

## **LOOKING AHEAD**

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

We will continue to develop our Third Party Risk Framework and Supplier Code of Conduct to ensure that we remain robust and alert. We remain committed to making a positive contribution to 'a world without slavery'

This Statement was approved by the Board on 12 September 2024.



**Bhavesh Mistry, Chief Financial Officer**  
The British Land Company PLC

