

# MODERN SLAVERY ACT 2015 –STATEMENT PURSUANT TO SECTION 54

## INTRODUCTION FROM THE CHIEF EXECUTIVE

We are committed to improving our practices to combat slavery and human trafficking.

## OUR BUSINESS, STRUCTURE AND SUPPLY CHAIN

We are a privately-owned property development business that manages the whole development process across the various projects that we deliver. We work with partners on each project, whether they are occupiers, landowners or investors. Stanhope Holdings Limited is the parent company of the Stanhope Group. The Group had 59 employees on average during the financial year ending 31 March 2021 and operates exclusively in the U.K. The Group had an annual turnover of £22.6m in the financial year ending 31 March 2021, so is making this statement voluntarily. This statement is made on behalf of the Group – details of the companies within the Group can be found in our latest company accounts at Companies House.

Our business is focused on office, residential and retail markets, primarily in London. Our projects include individual buildings, new estates and large-scale master planned, mixed-use developments.

Our supply chains include building contractors, sub-contractors, building product suppliers as well as professional consultancies providing design and other building-related services. Typically, we will administer the performance of such contracts for our partners, as their development manager. In certain circumstances, however, we will enter into direct contracts with these entities to provide works, goods and/or services.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our modern slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships. We expect each entity in our supply chain to conduct due diligence on their suppliers, as it is not practical for us (and for every other participant in the chain) to have a direct relationship with all links in the supply chain.

This modern slavery policy can be found on our website (<http://www.stanhopeplc.com/>), and our policy is provided to our employees and suppliers.

## RISK ASSESSMENT AND DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We have carried out and regularly update a risk assessment of our business and supply chains, and analysed the following potential external risk areas:

- a. Country Risk – **low** - currently, Stanhope operates exclusively in the United Kingdom, although Stanhope does deal with international organisations (including within its supply chain), some of whom may be new to the UK market and not familiar with its laws and business practices.

- b. **Sector Risk – high** – construction is seen as a high risk sector, with its fragmented supply chains, opaque procurement processes and high demand for migrant labour.
- c. **Transaction Risk – medium** – Stanhope operates on the basis of repeat relationships with significant parts of its supply chain with which it has built strong relationships. Certain projects, however, involve a large number of contractors, including lower skilled trades with a consequent increase in the potential for labour exploitation.

Stanhope developments typically involve top tier contractors and consultants which are similarly committed to eradicating modern slavery in the construction industry. Stanhope carries out appropriate due diligence on its partners, contractors and consultants, and, to a reasonable extent, relies on these contractors and consultants to enforce its policies down through the supply chain, which are typically short supply chains for the construction industry.

## EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We have zero tolerance to slavery and human trafficking. In the financial year ending 31 March 2021, we have taken the following steps:

- as part of our commitment towards ESG and to further our capabilities and help meet our ambition in this area, we undertook a recruitment process for a new role of Head of ESG who was appointed in May 2021, with responsibilities that extend beyond development projects to encompass all of Stanhope's ESG matters across the full range of our business activities;
- we have reviewed and updated our company policy regarding modern slavery, which sets out the responsibilities of those working for us in upholding our position on modern slavery and provides guidance on how to recognise and deal with modern slavery and human trafficking issues;
- we have continued to require that all our trade contracts, construction management agreements, building contracts and professional appointments contain provisions to require that counterparties comply with our company policy (or an equivalent policy) on modern slavery and also that they and their sub-consultants and sub-contractors pay its employees the Foundation Living Wage;
- Macfarlanes LLP, our solicitors, have delivered a training session on modern slavery and our company policy for all staff, and in particular, our project delivery teams.

In the financial year ending 31 March 2022 we intend to take the following steps:

- we will review our due diligence process on our partners and supply chain to determine what further steps we should take to monitor and enforce our zero tolerance to slavery and human trafficking;
- continue to undertake employee training about modern slavery;
- engage with specialist bodies such as Stronger Together;
- engage with our supply chain to discuss the practical steps they take to address modern

slavery risk at our construction sites with a view to introducing new measures of verification and reporting such as conducting surveys of people working on our sites.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff on the risks posed by these issues and our company policy on an annual basis.

This statement is voluntarily made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2021. Board approval was given to this statement on 22 September 2021.

Signed:

A handwritten signature in blue ink, consisting of several loops and flourishes, positioned above the name of the signatory.

David Camp, Chief Executive Officer

Date: 23/9/21