

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 69 employees on average during the financial year ending 31 March 2024 and operates exclusively in the U.K. The Group had an annual turnover of £31m in the financial year ending 31 March 2024, 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 chain includes 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 - given that Stanhope currently exclusively operates in the United Kingdom, but we do deal with international organisations, including those who may be new to the UK market and therefore not familiar with its laws and business practices.
- b. Sector Risk – high – construction is seen as a high-risk sector.

- c. Transaction Risk – low – principally due to the repeat relationships with our supply chain, and also in relation to public procurement procedures (OJEU) which are seen to be higher risk.
- d. Business Opportunity Risk – low – risk areas in this category include those which involve many contractors or intermediaries, which can be relevant to Stanhope, particularly with regard to the process of identifying and securing new business opportunities.
- e. Business Partnership Risk – low – i.e. those involving joint venture partners and consortia.

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 2024, we have taken the following steps:

- We initiated a supply chain risk mapping exercise, contacting 55 of our key construction partners to assess their workforce composition and practices across ten areas through self-assessment. Results revealed that a significant portion of our supply chain relies on temporary labour, increasing the risk of unfair pay as tiers between employer and worker accumulate. We queried suppliers about labour practices, particularly regarding the use of umbrella companies and compliance with temporary worker legislation.
- In collaboration with our construction partners, we have taken steps to monitor compliance with our and their policies and zero tolerance to modern slavery by having third-party labour audits and interviews with workers undertaken on site at our projects at Woolgate and 76 Southbank. A variety of different trades of workers were interviewed as part of the process. We have reviewed the findings of the workers interviews with our construction partners and are ensuring they respond accordingly.
- We pursued our commitment to the Living Wage Foundation as a Living Wage Accredited employer. We confirmed that all directly employed staff and regularly employed contractors are paid a Living Wage.
- 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 on modern slavery and that they and their sub-consultants and sub-contractors pay their employees the Foundation Living Wage. This requirement, alongside requirement for third-party ethical labour practice audits and employment interviews to be conducted regularly on our construction sites by our partners to monitor compliance, are included in our Ethical Labour Policy.
- Macfarlanes LLP, our solicitors, delivered a training session on 4 July 2023 on modern slavery and our company policy for all staff which was recorded and shared with all employees. This helped strengthen the identification, monitoring and management of risks of modern slavery and unethical work practices occurring in our industry.

In the financial year ending 31 March 2025 we intend to take the following steps:

- Continue to review and enhance 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.
- Develop our response to temporary labour risk management in our supply chain.
- Continue to undertake employee training about modern slavery to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and identify risk mitigation measures.
- Continue to undertake third-party labour audits and interviews with workers on site at more of our projects and engage with our construction partners to check they have investigated and taken appropriate actions to address findings of concern raised.
- Continue to engage with our supply chain to discuss the practical steps they take to address modern slavery risk at our construction sites.

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 2024. Board approval was given to this statement on 4 July 2024.

Signed:



David Camp, Chief Executive Officer

Date: 16 July 2024

