

Modern Slavery Statement

8 September 2022

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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.

Globally, an estimated 40 million people are victims of modern slavery, with 25 million in forced labour. Approximately 16 million people are exploited globally in the private sector with the construction sector ranking second for the prevalence of modern slavery, after the domestic sector (18% and 24% respectively)¹. The latest figures in the UK (2021) reveal over 12,500 potential victims of modern slavery referred to the National Referral Mechanism² (NRM) the UK's framework for identifying and supporting victims of modern slavery. This represents a 20% increase compared to 2020 (10,601) and the highest number of referrals since the NRM began in 2009.

As a real estate company who designs, builds and operates buildings in the UK, we support the UK government in its drive to end forced labour, modern slavery and human trafficking and are taking action to stamp out this crime in our business and supply chains.

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 September 2021.

2. Our business and our supply chain

We are one of the leading real estate companies in the UK and our £12 billion portfolio spans 24 million sq ft (as at 31 March 2022) of well-connected retail, leisure, workspace and residential hubs. During the year, we completed the acquisition of U and I Group Plc (U+I) and a 75% stake in Media City in Salford. Both of these acquisitions gave us access to a significant pipeline of mixed-use development schemes and an additional portfolio of operational assets.

2.1 Our Employees

Landsec directly employs 565 people across the UK (as of 31 March 2022). These employees fulfil a variety of real estate related roles across client facing, commercial and marketing, operational, development, ESG and back-office compliance and support functions.

¹ [Construction and the Modern Slavery Act 0.pdf \(ciob.org\)](#)

² [Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary, 2021 - GOV.UK \(www.gov.uk\)](#)



2.2 Our supply chain

Our suppliers – anyone who provides goods and services to us – are a vital part of delivering our purpose and achieving our strategic objectives. As a real estate company that builds, invests and cares for buildings, we recognise that our supply chain is critical to the success of our company. Over 95% of our direct suppliers are based in the UK. None of our direct suppliers we source from are located in countries that have a high prevalence of modern slavery as defined by the [Global Slavery Index](#).

Our construction suppliers also source a broad variety of components and materials from companies all over the world on our behalf. Whilst these goods are not sourced directly by us, they are specified and procured in accordance with our guidelines.

3. Our modern slavery risk

Owing to our size, UK-based location and the nature of the Landsec workforce, the inherent risk of modern slavery in the recruitment and engagement of employees is considered to be low.

However, as noted above slavery and forced labour does occur in the real estate and construction industries across the world and therefore we recognise that we have an inherent higher risk of modern slavery in our supply chain. In particular:

- We work with service partners to manage our buildings including security, cleaning and waste management services. Though these are all UK-based, there is a risk due to the inherent nature of the work and the diversity of the labour force employed.
- We contract with construction companies on our developments and refurbishments and rely on them to resource the projects and purchase the materials and components. Some of these may be sourced from countries with weaker labour practices and employment laws.

To understand where the risk of modern slavery across our supply chain is higher, we have grouped our suppliers into categories of spend and then applied an overall risk rating to each category against each of the eight commitments within Our Supply Chain Commitment.

The risks described above were largely stable throughout 2021/22. However in 2021 we acquired U+I and Media City, which expanded our operations and supply chain. Our assessment of the modern slavery risk in these acquisitions is underway.

4. How we manage our risks

4.1 Governance and policies

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.

Through the course of this year, we have professionalised our approach to strategic procurement and management of our supply chain with a real focus on depth of relationship and collaboration in order to better understand and manage our inherent risks and opportunities including those related



to modern slavery. Through the work the team do, it helps to ensure we work with suppliers who uphold our ethical principles and consistently deliver value for our business, our communities and our planet.

To set an overall framework for our response and to help drive progress in tackling modern slavery across our business and network of suppliers, we have a suite of policies and guidance documents. These apply to all Landsec employees and are embedded across our business to ensure collective responsibility and action in achieving our goals. These are:

Employee Code of Conduct

Our 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.

View our [Code of Conduct](#).

Supply Chain Commitment

In an effort to build strong relationships with our suppliers and to ensure that together we can achieve wider social, economic and environmental benefits including tackling modern slavery, this year we launched our Supply Chain Commitment. This 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 of its forms within our business activity.

We have committed to ensuring all our strategic suppliers sign up to this commitment within the next 12 months issuing an addendum to contracts that reserves the right to terminate a relationship with a supplier or third party that is unable to demonstrate compliance or progress towards the eradication of modern slavery within its organisation and supply chain.

View our [Supply Chain Commitment](#)

Human Rights Policy

Our Human Rights 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.

View our [Human Rights Policy](#)

Materials Brief

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. Our Materials Brief explicitly requires our Tier 1 suppliers to ensure care and attention in the selection, sourcing and supervision of Tier 2 suppliers.

View our [Materials Brief](#)



Speak Up Policy and reporting

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 are raised, we would investigate thoroughly.

View our [Speak Up Policy](#)

4.2 Supplier due diligence and monitoring

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.

We ensure all strategic suppliers are aware and comply with our policies relating to modern slavery which are contractually enforced and regularly refreshed to ensure they are industry leading. Additionally, all new and renewing suppliers are asked due diligence questions related to human trafficking and slavery before they are onboarded and able to do business with us.

Suppliers' compliance to our new Supply Chain Commitment will be monitored via our regular supplier relationship meetings.

4.3 Training and capacity building

This year we have joined the [Supply Chain Sustainability School](#) to support our supply chain and direct employees in meeting our requirements, ensuring that when we buy goods and services, we deliver value for money, the environment and society.

The school offers a range of online resources covering all sustainability topics including modern slavery and is tailored to each category of spend within our supply chain. Based on the level of knowledge and level of sustainability risk in each category, action plans are developed to address the risk appropriately.

4.4 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 staff 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. All directly employed staff are paid the Real Living Wage or above.

5. 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 will include:

- Provision of supplier training through the Supply Chain Sustainability School to upskill our employees and suppliers, with delivery of modern slavery specific modules.
- Complete the assessment of modern slavery risk across legacy U+I business units and Media City.
- Raising awareness of our Speak Up Policy.



- Aligning our HR and procurement policies and processes with our new acquisitions.
- Reviewing how we perform supplier due diligence in order to select key performance indicators to track our activity.
- Refreshing our supplier onboarding process to ensure Modern Slavery requirements are effectively communicated, monitored, and enforced.

We will measure progress annually, reporting updates in our 2023 Modern Slavery Statement.

Approvals

This is our seventh 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 2022. 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 8th September 2022.

Mark Allan

Chief Executive Officer On behalf of Landsec

8th September 2022