

Modern Slavery Statement

30 September 2021

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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 in modern slavery, with 25 million in forced labour. The construction sector ranks second for the prevalence of modern slavery, after the domestic sector (18% and 24% respectively)¹. The latest figures in the UK reveal over 10,000 potential victims of modern slavery referred to the National Referral Mechanism,² the UK's framework for identifying and supporting victims of modern slavery. This, coupled with the implications of the Covid-19 pandemic and escalating labour shortages across our industry continue to sharpen our approach to addressing this risk in the year ahead.

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. It describes the policies, processes and actions Landsec has undertaken since our previous statement made in September 2020 to address and prevent modern slavery across our business and our supply chain.

This statement is aligned with the Ethical Trading Initiative's Modern Slavery Statements Evaluation Framework.

1 Structure, business and supply chains

Our business

We are one of the leading real estate companies in the UK and our £10.8 billion portfolio spans 23.5 million sq ft (as at 31 March 2021) of well-connected retail, leisure, workspace and residential hubs. We own and manage some of the most successful and memorable real estate in the UK.

Employees

Landsec directly employs 580 people across the UK. These employees fulfil a variety of real estate related roles across executive, leader, management, professional and support levels. Our HR policies support our desire to attract and retain a diverse workforce of colleagues who emulate our values and help build a culture that is accountable, empowering and supportive.

All colleagues receive an offer letter and contract detailing the terms and conditions of their employment. A comprehensive range of background checks is undertaken on all staff prior to employment. We consult and communicate with colleagues through a range of channels including

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, 2020 - GOV.UK \(www.gov.uk\)](#)



our Employee Forum and Affinity Network Groups. In addition, all employees have the right to join a union however we don't formally recognise any. All directly employed staff are paid above the real Living wage.

Our supply chain

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. We therefore seek to develop long-term, mutually beneficial and trust-based partnerships with suppliers whose values and cultures are complementary to our own.

We're committed to ensuring that all forms of work in our supply chain associated with our projects and contracts are voluntary and fair, and that the health, safety and wellbeing of all workers is a priority.

Our Supplier Code of Conduct, sets out the principles of how we conduct business and the behaviours and practices we expect of our suppliers and partners, including a commitment to comply with the Act. All suppliers are expected to comply with the Supplier Code of Conduct.

We have long-standing relationships with a limited number of UK based strategic suppliers who provide maintenance services such as cleaning and security, construction contracting services and professional and financial services.

We also source goods and services from a wider network of suppliers. 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.

2 Our governance and policies in relation to modern slavery

At Landsec, robust governance of modern slavery and human trafficking risks is critical to ensuring we have effective communication and implementation of our policies. This means we can deliver impactful activity to address any risks within our business and supply chain. Modern slavery is an issue that is governed by our Sustainability Committee, a senior management committee responsible for setting the strategy on how we respond to our relevant environmental, social and governance issues. The Sustainability Committee is chaired by our Chief Executive and reports to the Board. The Board review and approve the Modern Slavery Statement on an annual basis.

To drive progress in tackling modern slavery across our business and network of suppliers, we have a suite of policies and guidance documents. These policies apply to the whole of Landsec and are embedded across our business to ensure collective responsibility and action in achieving our goals.

Our modern slavery related policies and guidance documents are set out below:



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](#)

Employee Code of Conduct

Our Employee Code of Conduct sets out how we will behave to achieve our purpose and how we will treat our stakeholders, including our supply partners. It encourages our people to make the right decisions and to live our values.

View our [Employer Code of Conduct](#)

Supplier Code of Conduct

Our current Supplier Code of Conduct outlines “what we expect” and “how we expect” our supply chain to do and behave when working for us or working on our behalf.

We will be asking our strategic suppliers to commit to our refreshed Supplier Code of Conduct which outlines “what we expect” and “how we expect” our supply chain to do and behave when working for us or working on our behalf. We will be explicit on what our non-negotiables are related to the provision of safe and healthy working conditions and the protection of workers’ rights against forced, illegal or child labour.

View our [Supplier Code of Conduct](#)

Prohibited Materials List

Our Prohibited Materials List 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. The former to risk-assess materials and areas, and the latter as a control mechanism to promote sourcing responsible materials.

View our [Materials Brief](#)

Whistleblowing hotline

Our whistleblowing hotline allows any Landsec employee or anyone working on our behalf to report concerns about suspected impropriety or wrongdoing in confidence and anonymously. This operates as an independent third-party reporting facility, which can be contacted online or through a telephone hotline. If issues of modern slavery were reported, they would be immediately referred to our Sustainability Committee and to the Gangmasters and Labour Abuse Authority.



3 Identifying, preventing and managing our modern slavery risks

Owing to the size, UK-based location and nature of the Landsec workforce, the risk of modern slavery and human trafficking in the recruitment and engagement of Landsec employees is considered to be low, and our internal processes and checks are sufficient to mitigate any risk of modern slavery and human trafficking in our own workforce.

As advised by the Global Slavery Index and consistent within the real estate industry we recognise we have a higher risk of modern slavery with:

- Suppliers of labour in construction, security, cleaning and waste management services due to the inherent nature of the work and the diversity of the labour force employed to carry out these activities.
- Suppliers in the extraction and manufacturing of materials and components used on our developments and refurbishments are often from countries with weaker labour practices and employment laws.

To manage these risks, we carefully select and assess our strategic suppliers on their ability to prevent modern slavery risk through their operations and supply chain. We restrict the provision of these services to our strategic suppliers who have undergone due diligence checks, and whose internal policies and procedures are aligned with our own.

We complement our due diligence checks ensuring all suppliers are aware and comply with our policies relating to modern slavery as outlined above including our Human Rights Policy and our Supplier Code of Conduct. These are contractually required and regularly refreshed to ensure they are industry leading.

Our Prohibited Materials List explicitly requires our Tier 1 suppliers to ensure care and attention in the selection, sourcing and supervision of Tier 2 suppliers, and takes a risk-based approach based on robust data including the Global Slavery Index and Ethical Trading Initiative.

This year, we will enhance the assessment of our supply chain to further identify those suppliers in high risk industries and from countries with a high risk of modern slavery. We will couple these criteria with our annual spend to determine those suppliers who are at higher-risk of modern slavery.

4 Our due diligence processes

We continue to focus our due diligence processes on a pre-qualification survey, compliance with the Supplier Code of Conduct and supplier relationship management meetings. Our pre-qualification survey is comprehensive from a typical supplier due diligence perspective but also seeks to ensure our suppliers sign up to our Supplier Code of Conduct which explicitly requires that all forms of work in any part of our supply chain are voluntary, safe and fair and that all workers' rights need to be protected including any forced, illegal or child labour. Compliance to our Supplier Code of Conduct is also monitored in our strategic relationship management meetings.



5 Effectiveness

We aim to create a centralised procurement function in the next reporting period providing an opportunity to have a holistic view and consistent approach to how we address the risk of modern slavery in the supply chain.

In the year ahead, we will focus on two areas:

- Refreshing our Supplier Code of Conduct, ensuring that we effectively communicate this to our strategic supply chain and instigate an appropriate level of audit to assess compliance.
- Reviewing and enhancing our pre-qualification assessment to ensure we ask the right questions when we onboard suppliers and furthermore review the material that we receive.

We aim to measure the effectiveness of our due diligence and are considering key performance indicators, such as number of suppliers identified as high risk of modern slavery and number of high risk suppliers audited.

We will measure progress annually, reporting these figures in our Modern Slavery Statement.

6 Training and capacity building

This year, in partnership with Stronger Together, Landsec employees from different business functions including sustainability, procurement, risk, operations and development participated in a modern slavery training and awareness session.

In the year ahead, we plan to roll out these sessions to Landsec employees as part of ongoing awareness.



7 Approvals

This statement is published in accordance with the Modern Slavery Act 2015. It describes the activities Landsec has undertaken since our previous statement made in September 2020 to address and prevent modern slavery across our business and our supply chain.

This is our sixth Slavery and Human Trafficking Statement (“Statement”) made pursuant to Section 54 of the Modern Slavery Act 2015 ‘Transparency in Supply Chains’ (“Act”). The Act introduced a number of measures to combat slavery and human trafficking and to improve the transparency of reporting on modern slavery, including a requirement on companies with an annual turnover of at least £36m to report annually on its workforce and supply chain, and specifically to confirm that workers are not enslaved or trafficked.

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 2021. It sets out the steps Landsec has taken, and is proposing to take, to address the risk of slavery and human trafficking taking place 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 and such arrangements) are treated as being part of our supply chain.

This statement was approved by the Board on 30th September 2021.

Mark Allan

Chief Executive Officer On behalf of Landsec

30 September 2021