



The British Land Company Plc (“British Land”) Slavery and Human Trafficking Statement 2023

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 is our eighth annual slavery and human trafficking statement (“Statement”) pursuant to section 54(1) of the Modern Slavery Act 2015 (MSA). This Statement covers The British Land Company Plc (“British Land”) as well as our wholly owned subsidiaries and those joint ventures and funds managed by us.

ABOUT BRITISH LAND

British Land own or manage a portfolio valued at £13.0bn (British Land share: £8.9bn) as at 31 March 2023 making us one of Europe’s largest listed real estate investment companies.

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 managed joint ventures and funds all operate in line with British Land policies.

At 31 March 2023 British Land and its subsidiaries had 641 direct employees, British Land has always paid directly 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 also done in recent years in encouraging its supply chain to do the same. Our supply chain consists of approximately 1901 direct suppliers. Our total spend with these third parties amounted to £557million. Broadly, this is spent on construction-related, property-related and company running costs.

POLICIES

We have policies in place to protect our employees and their labour rights in our operations including policies around working hours, payroll, and Right to Work checks. Compliance with these policies is monitored by the Human Resources team and these are reviewed on an annual basis with ad-hoc updates when there are changes in employment law. British Land’s Human Resources Director is responsible for these policies. 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. The [Sustainability Policy](#) is available on our external website and on our employee intranet.

Details of our confidential professional third-party whistleblowing channel, which employees can use to report any concerns of unethical behaviour, are provided on our intranet and posters are displayed prominently around our offices. 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 available on our external website.

TRAINING AVAILABLE TO STAFF

On joining British Land, each employee undergoes a corporate induction that outlines British Land’s expectation that our employees maintain high standards of ethical business conduct, and a requirement that our relationships with competitors, suppliers and clients must be based on high standards of personal and professional ethics.

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 their induction, regular internal communications and periodic training.

Through training and communications, we continue to raise awareness of modern slavery and human trafficking with employees and contractors to ensure that they are able to identify and report suspected instances. 1

RISK AREAS

Our real estate portfolio is located entirely in the UK and our direct employees are primarily office-based professionals, putting them at low risk of modern slavery or human trafficking.

We consider people within our supply chain to be at higher risk than our own employees and we manage this risk through our procurement function. The professionalisation of this function has enabled us to improve supply chain standards and transparency, particularly through greater due diligence during the supplier onboarding process.

British Land partners with a specialist organisation called Unseen who support the upskilling of businesses to reduce and eliminate worker exploitation. Based on our due diligence and risk assessment methodology developed with Unseen, we have identified three areas of primary risk classified as:

1. the procurement of specific materials
2. fair treatment of workers on construction sites, and
3. procurement of labour services in relation to property management activities.

Each of these areas is explained in more detail below.

REDUCING RISK IN THE SUPPLY CHAIN

Our supply chain is broad and includes direct suppliers (e.g. legal advisors, property managers, construction contractors) as well as indirect suppliers (e.g. cleaning, security, construction materials manufacturers).

Approach to improving standards throughout our supply chain

We actively communicate our social and ethical standards to all our suppliers via our onboarding process, contracts, Supplier Code of Conduct and supplier events and communications. Through our Sustainability Strategy and related initiatives, we leverage our scale and scope to engender more responsible supplier behaviour and practices. This is now explicitly stated within our new 2030 Sustainability Strategy, which highlights the importance we place on responsible business conduct and, specifically, the prevention of modern slavery.

We have continued to work with Unseen to ensure our [Supplier Code of Conduct continues to stretch our suppliers on ethical practices](#). All Suppliers are required to sign up to this code as part of the onboarding process. Suppliers are required to periodically review and recertify the code to ensure they maintain compliance.

The Code sets out our expectations of our suppliers and their obligations in:

- **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 British Land suppliers must acknowledge their understanding of, and their obligations within, this Supplier Code of Conduct. A breach by a supplier of the Code of Conduct may be considered a material breach of the supplier's contract with British Land and a supplier shall provide British Land with reasonable access to all relevant information and premises for the purpose of assessing performance against the Supplier Code of Conduct.

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.

We work with our suppliers to manage the risk of human rights violations in procured labour. All our UK suppliers are required to pay their UK based employees at or above the Real Living Wage: 93% of hours worked by their UK based staff in FY23 were remunerated at or above the Living Wage, an increase from 79% in 2022.

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

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 screens and monitors the complete supplier base and we are notified of any ethical, fiscal or reputational issues of concern that have been identified.

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 as a result would be reported to the Executive Risk Committee and then to the Board Audit Committee and/or the Corporate Social Responsibility Committee as appropriate depending on the nature and severity of the breach.

Since 2020 we have partnered with Unseen - the UK's Modern Slavery Business Helpline www.unseenuk.org/back2source, which is fed by situational data gathered from reported incidents to the Modern Slavery and Exploitation Helpline. This service allows members of the public to report a potential modern slavery incident anonymously. We are alerted to any reports of potential worker exploitation which enables us to take appropriate action where necessary.

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 a "very good", "excellent" or "outstanding" 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 Developments 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 FY23 is 41.6 out of 45 (2022: 39.1), compared to the industry average of 39.91 (2022: 38.54).

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 are continuing to support suppliers in improving their oversight of appropriate documentation and awareness among their staff of Modern Slavery Policies. No modern slavery concerns were identified on our sites during the year to July 2023.

3. Procurement of Labour Services in relation to Property Management

The third area we believe to be high risk is among the supply chain used in property management, particularly cleaners and security guards. This group of suppliers is included in our Work Practice Audit programme and are made aware of the services available through our partnership with Unseen to encourage open and safe reporting of any such incidents.

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.

In the last 12 months we have completed Work Practice Audits with 10 of our highest-risk construction suppliers. These provide an effective way of creating transparency into actual working practices within our construction supply chain. Through unannounced one to one interviews with individuals employed by our contractors and working on site, 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.

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.

This Statement was approved by the Board on 14 September 2023.



Bhavesh Mistry, Chief Financial Officer
The British Land Company PLC