



The British Land Company Plc Slavery and Human Trafficking Statement 2025

INTRODUCTION

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 slavery and human trafficking statement ("Statement") pursuant to section 54(1) of the Modern Slavery Act 2015 (MSA) covers The British Land Company Plc ("British Land") as well as our wholly owned subsidiaries and those joint ventures where we provide management services. Our statement is reviewed and published annually on [Britishland.com](https://www.britishland.com) and disclosed on the UK Government Modern Slavery Statement Registry.

At British Land we make responsible choices across all areas of our business. We require our customers, partners and suppliers to do the same within their own businesses.

As of the date of publication, no incidents of modern slavery have been identified or reported in our business or supply chain. In this statement "FY25" refers to the year to 31 March 2025.

ABOUT BRITISH LAND

British Land is a UK commercial property company focused on real estate sectors with the strongest operational fundamentals: London campuses, retail parks, and London urban logistics. We own or manage a portfolio valued at £14.6bn (British Land share: £9.5bn) as at 31 March 2025.

Some of our managed assets are in joint ventures. In most of our partnerships, we provide asset management, development and corporate services, and we earn performance and management fees. British Land's managed joint ventures all operate in line with British Land policies.

OUR STRUCTURE

The Board maintains a strong governance framework that ensures accountability and an appropriate culture whilst maintaining a relentless focus on the successful execution of the Company's strategy. The Board delegates appropriate responsibilities to its Committees, which in turn report upward, allowing the Board to make well-informed and timely decisions.

British Land typically contracts with its supply chain at group level and all group policies and procedures are cascaded to its subsidiaries. A comprehensive list of our legal entities can be found in our British Land Annual Report and Accounts.

OUR EMPLOYEES

We are a responsible employer, creating a safe and diverse working environment where people are comfortable to be themselves. This approach is embedded in our company values.

At 31 March 2025, British Land and its subsidiaries had 631 direct employees. Our employees perform a wide range of roles including customer facing property management, asset development, finance, sustainability, procurement, marketing and risk and compliance.

All employees are subject to pre-employment checks which includes a right to work check. All direct employees receive an offer letter and contract.

British Land has always paid direct employed staff at least the Real Living Wage. British Land has been an Accredited Living Wage Employer certified by the Living Wage Foundation since 2023 and through its Supplier Code of Conduct requires its suppliers to pay their employees who work at British Land assets at or above the Real Living Wage.

TRAINING

On joining British Land, each employee attends a corporate induction that outlines our expectations for ethical business practice including how to conduct relationships with competitors, suppliers and clients

Through regular internal communications and periodic training, 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 these education and training activities we increase awareness of modern slavery and human trafficking with employees and contractors and ensure that they are equipped to identify, and report suspected instances.

POLICIES

We have policies in place to protect our employees and their labour rights including working hours, payroll, and Right to Work checks. Compliance with these policies is monitored by the Human Resources team and are reviewed on an annual basis with ad-hoc updates when there are changes in employment law. Development and implementation of these policies is led by the Head of Employee Relations. British Land's Chief Financial Officer is the Board member tasked with oversight of British Land's modern slavery policies.

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.

British Land provides a confidential professional third-party whistleblowing channel, which employees can use to report any concerns of unethical behaviour. 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 shared on our external website.

OUR SUPPLY CHAIN

We value our supplier partners and the contribution they make in delivering our business objectives. We are committed to developing long-term mutually beneficial partnerships with suppliers whose values align with our own.

We assess our supply chain for risk of modern slavery on an ongoing basis in the following areas:

1. Sector and Industry Risk: some sectors are known to be higher risk because of labour intensity, subcontracting, and prevalence of temporary or low-paid work
2. Geographic Risk: goods and/or services derived from regions with weak labour enforcement or high migrant labour use
3. Labour Profile Risk: do services comprise higher use of migrant workers, agency labour, seasonal or temporary staff, and workers in low-wage or low-skill roles which could be more vulnerable to exploitation

Our first tier supply base has the following geographical spread:

Region	Percentage of Suppliers
UK	95.9%
Europe	2.7%
North America	1.3%
Middle East	0.1%
Oceania	0.1%

Our supply chain can broadly be categorised as follows;

Area	Description	Modern Slavery Risk	Inherent Risk Rating	Residual Risk after Mitigations
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				and Controls set out below
Service Partners	Providers of essential property management services such as cleaning, maintenance, security, front of house, and waste management. Selected locally where possible to support surrounding communities.	Risks may arise from low-wage sectors (e.g. cleaning, security), use of migrant or agency labour, and subcontracting chains that can obscure labour practices.	Medium	Low
Main Contractors	Prime contractors supplying materials and construction workers for new developments and refurbishments. British Land works closely with them to maintain standards across their own supply chains.	Higher risks linked to construction supply chains, particularly sourcing raw materials (e.g. stone, steel, timber) internationally, and reliance on temporary or migrant labour.	Medium	Medium-Low
Professional Service Providers	Specialist firms delivering professional and consultancy services such as legal, financial, architectural, engineering, surveying, design, and project management support. Typically engaged through direct contractual relationships.	Generally lower risk due to regulated professional standards and skilled labour profiles, but residual risks exist in outsourced administrative support, facilities, or offshore service centres.	Low	Low

We operate a robust and thorough supplier due diligence and onboarding process. 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 organisation screens and monitors our supplier base and we are notified of any ethical, fiscal or reputational issues identified.

We communicate our Social, Sustainable and Ethical expectations through our [Supplier Code of Conduct](#) and we apply these standards across all procurement decisions. All direct Suppliers are required to sign up to this code as part of the onboarding process.

Our Supplier Code of Conduct sets out what we stand for, how we work and the commitments we expect from our Supply Chain in the areas of:

- **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 suppliers to British Land must acknowledge their understanding of this Supplier Code of Conduct and their obligations within. A breach of this code by a supplier may be considered a material breach of the supplier's contractual arrangements with British Land.

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

Suppliers are required to provide British Land with reasonable access to all relevant information and premises for the purpose of assessing compliance against the Supplier Code of Conduct.

Since 2020, we have partnered with Unseen - the UK's Modern Slavery Business Advisory Service. This specialist organisation provides guidance and support for organisations who share their vision of 'a world without slavery'

REDUCING RISK IN THE SUPPLY CHAIN

Through our Sustainability Strategy and related activities, we leverage our scale and scope to engender more responsible supplier behaviour and practices. This is explicitly stated within our 2030 Sustainability Strategy, which highlights the importance we place on responsible business conduct and, specifically, the prevention of modern slavery.

We work with our suppliers to manage the risk of human rights violations in procured labour. In 2023 we became an accredited Living Wage employer. Since July 2024, 100% of our suppliers' employees working regularly at our locations were paid the Real Living Wage. We are pleased to have retained our accreditation as a Living Wage Employer in July 2025.

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

We have continued our Work Practice Audit Programme with Unseen conducting ten on-site audits with our highest-risk suppliers during FY25. These audits provide an effective way of creating transparency into working practices within our supply chain. Through unannounced one to one interviews with individuals working on site, employed by our contractors, 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. Supplier failure to meet our required standards is treated as a breach of contractual terms and necessary action is taken.

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 are reported to the Executive Risk Committee and then to the Board Audit Committee and/or the ESG Committee as appropriate, depending on the nature of the breach.

Based on our due diligence and risk assessment methodology we have identified three areas of primary risk for modern slavery classified as 1) material procurement, 2) construction workers 3) property management labour:

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 an "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 Our Places 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 FY25 is 42.8 out of 45 (2024: 42.7), compared to the industry average of 40.7 (2024: 40.5).

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 continue to support suppliers in improving their oversight of appropriate documentation and awareness among their staff of Modern Slavery Policies.

3. *Procurement of Labour Services in relation to Property Management Services*

The UK based supply chain used in the provision of property management services, particularly cleaners and security guards are included in our Work Practice Audit (WPA) delivered by Unseen. This process supports a safe and open reporting approach to any potential or actual incidents. Results of audits are shared with Service Partners and where necessary corrective action plans put in place. In the Work Practice Audits conducted over the last 12 months, no evidence of modern slavery was found.

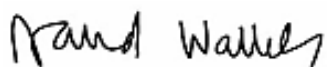
We encourage suppliers of these services to employ people who live close to our places. This increases local employment and builds closer relationships with the local communities that host our assets.

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.

We will continue to develop our Third Party Risk Framework and Supplier Code of Conduct to ensure that we remain robust and alert. We remain committed to making a positive contribution to 'a world without slavery.'

This Statement was approved by the Board on 12 September 2025.



David Walker, Chief Financial Officer
The British Land Company PLC