

## **Broadgate Estates (BE) – Slavery and Human Trafficking Statement 2018**

Modern slavery and human trafficking are grave forms of human rights abuses. We recognise the importance of respecting human rights and are committed to taking steps that help prevent modern slavery and human trafficking in our business and our supply chain.

This is our third annual slavery and human trafficking statement (“Statement”) pursuant to section 54(1) of the Modern Slavery Act 2015. This Statement is specific to Broadgate Estates, a wholly-owned subsidiary of The British Land Company plc (“British Land”). British Land has also published its own Slavery and Human Trafficking Statement, which can be found here: [britishland.com/msa](http://britishland.com/msa).

### **About Broadgate Estates**

We manage a portfolio of spaces in the UK. As a Managing Agent, we spend service charge on behalf of our Clients and provide services including property and asset management, occupier services, technology solutions, and consultancy.

All Broadgate Estates’ direct employees are UK-based and paid at or above the Real Living Wage Foundation’s Living Wage, an independently calculated wage based on the minimum amount that employees and their families need to live on.

Our supply chain consists of approximately 1600 direct suppliers. Our total spend with these third parties amounted to £279m in FY18.

### **Our 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 updates are made on an ad-hoc basis 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 corporate values centre around excellence, trust, and integrity. On joining the Company, each employee is provided with the Broadgate Estates Employee Handbook which sets our expectation that our employees maintain high standards when it comes to ethical business conduct, and a requirement that our relationships with competitors, suppliers and clients be based on high standards of personal and professional ethics.

Our Employee Handbook also describes our confidential whistleblowing channel, which employees and third parties can use to report any concerns of unethical behaviour. Our whistleblowing policy is available on our Intranet.

### **Our risk areas**

Our workforce consists primarily of office-based professionals in the UK, putting them at low risk of modern slavery and human trafficking. However, we purchase a significant proportion of the services required to undertake our business activities. While the majority of our direct suppliers are based in the UK, these suppliers source some materials and services from around the world. We consider people within our supply chain to be at higher risk and manage this through our procurement function. With support from British Land the professionalisation of this function is enabling us to improve supply chain standards and transparency, particularly through the application of greater due diligence during the supplier onboarding process.

Within our supply chain we believe there to be two specific areas of high risk, namely the procurement of materials and source of labour services in relation to property management. We work closely with British Land to understand the risks associated with procurement of supplies and services we use in our supply chain including ‘Labour practices and fair play’.

## Reducing risk in our supply chain

Our supply chain is broad and includes both direct suppliers (e.g. cleaning, security and engineering) as well as some indirect suppliers (e.g. specialist contracting services).

We actively communicate our social and ethical standards to our suppliers via our onboarding process, contracts, Code of Conduct and supplier events. Through the British Land Sustainability Strategy and related initiatives, we leverage our scale and scope to encourage responsible supplier behaviour and practices.

This year British Land introduced a new Supplier Code of Conduct which builds on the good practice established through the earlier Supply Chain Charter, which it replaces.

The new Code sets out our expectations of our suppliers and their obligations in areas such as:

- **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.
- **Environmental:** sourcing of materials, environmental management, air quality and waste management.

As part of our ongoing relationship with our suppliers we ask all suppliers to comply with this code.

All new suppliers to British Land and British Land joint venture properties that we administer are required to acknowledge their understanding of, and their obligations under this Supplier Code of Conduct. A breach by a supplier of the Supplier Code of Conduct may be considered a material breach of the supplier's contract with us and a supplier shall provide us with reasonable access to all relevant information and premises for the purpose of assessing performance against the Supplier Code of Conduct.

Through our tendering and contracting procedures suppliers are required to uphold the requirements of the Supplier Code of Conduct and ensure any subcontractors they appoint do the same. These obligations are reflected in our contractual documentation, through which we specify that suppliers must prohibit child labour, forced labour and exclusive zero-hours contracts.

We work with our suppliers to reduce the risk of human rights violations in procured labour. All of our UK suppliers are encouraged to pay their UK based employees at or above the Real Living Wage.

We operate an online supplier portal that requires all suppliers with turnover over £36 million to upload a copy of their Slavery and Human Trafficking Statements on an annual basis, providing comfort that this issue remains front of mind with management teams.

We have also strengthened our internal procedures in relation to procurement by screening and monitoring our supply chain. Anti-Bribery and Corruption related checks are carried out on any new suppliers and the whole supply chain is screened and monitored by a 3rd party specialist company and we are notified if any supplier is matched against a grid monitoring ethical, fiscal, or reputational issues.

## Training available to suppliers and staff

On joining the Company all full time and fixed term contractors receive training on human rights and modern slavery as part of the corporate new employee induction programme. 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, slavery and human trafficking through the employee handbook, internal communications and periodic training as appropriate.

We will 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.

### **Looking ahead**

We recognise that responding to an issue as serious as modern slavery and human trafficking requires constant vigilance. We will continue to seek opportunities to further reduce the risk of human trafficking and modern slavery in our operations or supply chain.

We will also continue to manage and report on the performance indicators disclosed in this Statement in order to measure our programme's effectiveness over time. We will also work with our parent company, British Land, to improve our initiatives around this topic.

**This Statement was approved by the Board on 16 August 2018.**



**Rob Fisher**  
**Technical and Environmental Director**  
**Broadgate Estates**