## STATEMENT OF PEEL L & P HOLDINGS (UK) LIMITED ON BEHALF OF THE PEEL L& P GROUP PURSUANT TO THE MODERN SLAVERY ACT 2015 ("THE ACT")

This is the Modern Slavery and Human Trafficking statement of Peel L & P Holdings (UK) Limited (Peel L&P) made on behalf of The Peel L & P Group and all its subsidiaries and UK Group companies. This statement is made pursuant to Section 54, part 6 of the Modern Slavery Act 2015 (the 'Act') and has been adopted by all subsidiaries as their respective slavery and human trafficking statement for the financial year ending 31 March 2021.

# **Organisation Structure**

Peel L&P is an ambitious regeneration business with generations of history, heritage and expertise in our DNA. First established in 1971, Peel L&P is now responsible for some of the most transformational development projects in the UK today.

Owning and managing 12 million sq ft of property and 20,000 acres of land and water, our holdings are concentrated in the north west of England, but we also own and manage significant assets throughout the UK with a total portfolio value of  $\pounds 2.4$  billion.

As a part of the Peel Group we are integral to a business that strives to make a positive impact on people's lives.

Our legacy matters. We take great pride in the outcomes we achieve, the people we work with, the way we go about our business and the transformational projects we deliver.

Our specialist teams have a proven track record in delivering high-quality, legacy projects across land, property, water and airspace. This includes airports, hotels, waterways, media hubs, event spaces, leisure facilities, retail, workspaces, residential development, industrial & logistical space, public realm, historic gardens and the renewable energy sector.

Peel L&P is an agile and ambitious business with a legacy of success for a long-term, sustainable future.

We see possibility. We deliver transformation.

# Policies

Peel L&P is committed to ensuring, as far as practically possible, that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Policies are in place and reviewed regularly in relation to employee conduct and welfare. In addition, a separate Human Trafficking and Modern Slavery Policy has been issued to all employees and is included in the induction process.

All of our new starters are required to read, and acknowledge that they have done so, each of the policies referred to above.

The following policies are considered to be of particular importance in tackling modern slavery and human trafficking:

- Code of Professional Conduct Policy which provides a set of rules to ensure that all employees uphold the highest level of ethical conduct in their day-to-day business;
- Diversity & Inclusion Guide which aims to create a working environment in which all individuals are treated fairly and ethically, able to make best use of their skills, free from discrimination or harassment;

- Whistleblowing Policy which encourages the reporting and exposure of unethical behaviour. All matters raised via whistleblowing or through the auditing processes are diligently investigated and appropriate action taken.
- Supplier Charter which sets out our aim to engage with all of our key suppliers.

### **Due Diligence**

Due to the diverse nature of the business, our supply chain comes from many different areas. However, in all its dealings with its suppliers Peel strives to ensure that the highest ethical standards are reached at all times.

Our general conditions of contract make it a requirement that all new suppliers comply with the Act. In addition, as part of our new supplier process we ensure that any new supplier has confirmed that they comply with the Act before they are accepted as a new supplier. We will continue to review our supplier due diligence processes, our Procurement Policy and Supplier Charter in relation to slavery and human trafficking over the forthcoming year. Existing suppliers will be notified of the updated policy and if they continue to carry out work on behalf of Peel then they will be deemed to confirm acceptance of and compliance with it.

As expected of any responsible employer, we have recruitment systems in place to prevent forced labour and to ensure that all employees are entitled to work in the UK. We ensure that all people directly employed by Peel L&P do so at their own free-will and understand that they can cease their employment at any time under the terms of their employment contract. We compensate all our directly employed people with salaries and benefit packages that meet or exceed statutory minimum requirements. We abide by the Working Time Directive, unless people directly employed by Peel L&P voluntarily choose to opt-out (within the limitations imposed by the Working Time Directive).

### **Risk Management and Effectiveness**

Peel L&P continually reviews its various systems and processes to provide assurance that our risk management governance and internal control processes are operating effectively in accordance with the Codes of Professional Conduct and Ethics and International Standards governed by the Chartered Institute of Internal Audit (CIIA).

As the vast majority of our suppliers are based in the United Kingdom, we consider that they pose minimal risk in terms of non-compliance with the Act. Although we see our business as low risk in relation to the threat of slavery and human trafficking offences, we are fully committed to ensuring that both Peel and its suppliers comply with the Act.

### Training

Our People Team has carried out a review of our employee development programme and we have successfully rolled out online Modern Slavery training across the business which will continue annually.

This statement has been considered and approved by the Company's Board of Directors.

Steven Underwood Director

16th November 2021