

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

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1. Purpose

- 1.1 This policy is designed to establish and explain the controls that Canary Wharf Group plc and its subsidiaries (in any jurisdiction) use to combat slavery, servitude, forced or compulsory labour and human trafficking.
- 1.2 The policy is also to be used to provide information and guidance to anyone working for or with Canary Wharf Group plc and/or its subsidiaries on how to recognise slavery, servitude, forced or compulsory labour and human trafficking and how to deal with these issues.
- 1.3 The terms “we”, “us” or “our” throughout this document shall mean, as applicable, Canary Wharf Group plc and/or any or all of its subsidiaries.

2. Policy

- 2.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to slavery, servitude, forced or compulsory labour and human trafficking.
- 2.2 We will uphold all laws relevant to countering slavery, servitude, forced or compulsory labour and human trafficking in all or any jurisdictions in which we operate. However, we remain bound by the Modern Slavery Act 2015 (the “MSA”) regardless of the jurisdiction in which a particular transaction or transactions may occur.
- 2.3 Government guidance on the MSA sets out the definitions of slavery, servitude, forced or compulsory labour and human trafficking as follows:
 - 2.3.1 “**Slavery**” is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. As legal ownership of a person is not possible, the key element of slavery is the behaviour of the offender as if they are the owner of the victim, thus depriving the victim of their freedom.
 - 2.3.2 “**Servitude**” is the obligation to provide services that is imposed by the use of coercion and includes the obligation for the victim to live on the offender’s property and the impossibility for the victim to change their condition.
 - 2.3.3 “**Forced or compulsory labour**” involves coercion, either in the form of direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from the victim under the menace of penalty and for which the victim has not volunteered.
 - 2.3.4 “**Human Trafficking**” is the arrangement or facilitation by the offender of the transportation of the victim with a view to the victim being exploited. This offence can be committed even where the victim consents to the transportation.



These offences are known collectively as “Modern Slavery” in the remainder of this policy.

- 2.4 Modern Slavery is a severe human rights violation and needs to be eradicated. Any indication that Modern Slavery exists anywhere in our supply chain will be investigated and dealt with as a priority. We take our responsibilities under the MSA and other human rights legislation very seriously not just as a legal duty, but also as a matter of good business practice and ethics.
- 2.5 We shall ensure that we:
 - 2.5.1 have adopted procedures that are proportionate to the risks associated with the various aspects of the business, based on factors including, but not limited to, location risks, sector risks, transaction risks and business partnerships risks;
 - 2.5.2 demonstrate a commitment to the eradication of Modern Slavery throughout the organisation, led by the top level commitment of the senior management;
 - 2.5.3 undertake risk assessments to fully assess the nature and extent of our risks regarding Modern Slavery;
 - 2.5.4 carry out due diligence enquiries in respect of our dealings with third parties;
 - 2.5.5 carry out effective communication and training on all our policies and procedures to all staff; and
 - 2.5.6 will undertake monitoring and regular review of our policies and procedures to ensure continued compliance with legislation and best practice.

3. Scope

- 3.1 This policy applies to all individuals working at all levels and grades, including senior management, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors or any other person associated with us.
- 3.2 All individuals listed above (“you”) are expected to read, understand and comply with this policy. It is your duty to assist in the prevention, detection and reporting of suspected Modern Slavery and you must notify your line manager or a senior member of staff as soon as possible if you suspect any act of Modern Slavery is occurring within our supply chain or that any other conflict with or breach of this policy has occurred or may occur in the future.
- 3.3 You are encouraged to raise concerns about any issue surrounding or suspicion of Modern Slavery at the earliest possible stage. Employees should raise concerns using our Whistle-Blowing Policy.
- 3.4 We will fully investigate any instances of alleged or suspected Modern Slavery. We may also report any matter to the relevant authorities and provide all necessary assistance those authorities in their investigations and any subsequent proceedings.



4. Protection

- 4.1 You may be concerned about any possible repercussions of reporting your suspicions of instances of Modern Slavery.
- 4.2 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken either as to the facts or the law.
- 4.3 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that actual or potential Modern Slavery has taken place or may take place in the future.
- 4.4 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment such as denial of promotion or marginalisation connected with raising a concern. If you believe you have suffered any such treatment you should inform your line manager or a senior member of staff immediately. If the matter is not remedied, and you are an employee, you should raise it formally through the Grievance Procedure.
- 4.5 You are also protected under the law relating to whistle blowing against any detrimental treatment subsequent to making an allegation in good faith even if found to be incorrect.

5. Training and Communication

- 5.1 Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy.
- 5.2 Our zero-tolerance approach to Modern Slavery must be communicated to all other persons listed in paragraph 3.1 of the policy at the outset of our business relationship with them and as appropriate thereafter.
- 5.3 We shall undertake comprehensive due diligence in respect of our business associates in order to ensure that no Modern Slavery occurs in our supply chain, whether within the United Kingdom or overseas.

6. Monitoring and Review

- 6.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 6.2 The Company Secretarial team has primary day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any initial queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them and made aware of and understand this policy and are given adequate and regular training on it.



- 6.3 The Company Secretarial team will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.
- 6.4 You are all responsible for the success of this policy and should ensure that you use it to disclose any suspected danger or wrongdoing. All are invited to comment on this policy and suggest ways it might be improved by contacting the Company Secretarial team.
- 6.5 This policy does not form a part of an employee's contract of employment and may be amended from time to time.