

MODERN SLAVERY STATEMENT OF THE ALLIED LONDON GROUP

pursuant to the Modern Slavery Act 2015

This is the modern slavery and human trafficking statement of the Allied London group of companies (the “**Group**”), whose registered office at c/o Allied London, 12th Floor, No.1 Spinningfields, 1 Hardman Square, Manchester, M3 3EB, United Kingdom.

We are committed to combatting slavery and human trafficking in all its forms in our business and in our supply chain. The Group adopts a zero-tolerance approach to any criminal offence. This statement is made pursuant to Section 54, part 6 of the Modern Slavery Act 2015 (the “**Act**”) and has been adopted by all Group companies, their subsidiaries and sister companies as their respective slavery and human trafficking statement for the financial year ending 31 December 2021.

OUR STRUCTURE

The principle activities of the Group include, but are not limited to, property investment, development, development management services, building management, property management, estates management, facilities management, security, co-working, food and beverage operations, design (architectural and interior), mechanical and electrical services and the provision and operation of studio spaces . The Group currently owns, manages and keeps secured large mixed-use city centre and out of town locations and regeneration schemes in Manchester, London and Leeds, as well as managing individual properties for third parties.

OUR SUPPLY CHAINS

Due to the diverse nature of the Group, our supply chain is raised across multiple disciplines and locations. However, in all its dealings with suppliers, the Group strives to ensure that the highest ethical standards are reached at all times.

Our supply chains include but are not limited to: design and engineering consultants, construction contractors, suppliers of furniture, fixtures and equipment, building maintenance, service contractors, professional service providers (i.e., lawyers, accountants, surveyors), IT service providers, marketing and design agencies, recruitment agencies studios supply chains, design services, builders, door and windows contractors, lighting protection, high voltage, drainage and fire and security engineers, live music providers, food and drink providers and uniform and laundry services.

OUR POLICIES

The Group is committed to ensuring that, as far as practically possible there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to improving our practices to combat slavery and human trafficking and continue to do so.

Our Anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

In addition, there are various policies in place in relation to staff conduct and welfare that continue to be reviewed and, where necessary, amended to ensure they appropriately highlight the Group’s stance and protocol regarding forced labour, slavery or human trafficking to staff and third parties.

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

- **Dignity at Work Policy** which aims to ensure that all staff are treated and treat others with dignity and respect, free from harassment or bullying

- **Equal Opportunities Policy** which aims to create a working environment in which all individuals are 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

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Internal: As part of our initiative to identify and mitigate risk we have recruitment systems in place to ensure that all employees are entitled to work in the UK. We ensure that all staff directly employed by the Group 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 staff directly employed by the Group with wages and benefit packages that meet or exceed statutory minimum requirements. We have a modern slavery team, which consists of involvement from the following departments:

- Legal
- Human Resources
- Procurement

External: We endeavour to confirm with any new supplier and fully expect that they comply with the Act before they are accepted as a new supplier. We will continue to review our supplier due diligence process in relation to slavery and human trafficking to ensure that it is relevant and effective across all parts of the Group.

Employees: Employees themselves are required to familiarise themselves with all policies and procedures to assist in the identification and prevention of such criminal acts.

Additionally, we continue to examine and consider best practices to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers.

As the vast majority of our suppliers are based in the UK we consider that they pose minimum risk in terms of non-compliance with the Act. Although we see our business as low risk in relation to threat of slavery and human trafficking offences being committed, we intend to continue to monitor this position .

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we intend to review our agreements and dealings with suppliers and contractors to ensure compliance with anti-slavery measures.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide guidance and training for staff members who come into contact with suppliers. This is available at all times and we strongly encourage those members of staff to undertake this training if/when necessary. We also encourage our business partners to provide training to their staff, suppliers and providers.

This statement has been considered and approved by the Group's board of directors.

SIGNED on behalf of the Group:



Capital Holdco Ltd
Date: 24.03.2021