

# **URBAN&CIVIC PLC**

## **Annual Modern Slavery Statement**

Urban&Civic plc and all companies within its group of companies have a zero tolerance approach to modern slavery, both in its own business and in its supply chain. This statement is made pursuant to our obligations under the Modern Slavery Act 2015 and relates to our financial year ending 30 September 2020. This statement is made for both Urban&Civic plc and its subsidiary companies.

### **Structure and business of Urban & Civic PLC**

Urban&Civic plc is a UK based property development and investment company. Urban&Civic plc has approximately 102 subsidiary companies throughout the UK. The total number of employees of the Urban& Civic group is approximately 97.

Urban&Civic delivers strategic land parcels for homes and businesses, city centre regeneration projects and commercial developments. We pride ourselves on our engagement with the local communities in which we operate and we have a range of initiatives that are aimed at supporting these local communities to be sustainable and prosperous. For example, in several regions we engage with local communities, groups and training providers to encourage the development of skills relevant to construction and the built environment or opportunities within our developments. In many of our contracts with housebuilders, we include “jobs brokerage” provisions so as to support local people into work with our contractors and housebuilders, and businesses coming forward on sites.

### **Our supply chains**

We engage with a range of suppliers and third parties. For example, housebuilders on development contracts and construction contractors with respect to construction works. Our principal contractors may use sub-contractors to deliver elements of the contracted works. We also contract with consultants, materials suppliers and various other third parties. With respect to our principal contractors, we operate a relatively small list of “preferred contractors”. This allows us to have a good understanding of those contractors and their labour practices.

We consider that the mitigated risk of modern slavery in our own business is low. We also consider that the mitigated risk of modern slavery in our supply chains is low.

### **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our current Ethical Labour 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 business or in our supply chains.

## **Due diligence processes for slavery and human trafficking**

As part of our commitment to identify and mitigate risk, we:

- operate a “preferred contractor” list for the principal contractors that we engage with for construction works;
- require all contractors, consultants and housebuilders to complete PQQs and Employers’ Requirement forms when tendering for projects, which include responses to questions related to Modern Slavery Act compliance;
- include contractual obligations to require our contractors, consultants and housebuilders to comply with Modern Slavery Act obligations. Every contract includes our Ethical Labour policy to legally bind our counterparties to compliance;
- monitor and update on a monthly basis our Approved Contractor database which includes an assessment of their Modern Slavery Act procedures;
- regular discussion at Consortia meetings of ethical labour policies and procedures.

## **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 require all employees to complete an e-learning module on modern slavery.

## **Further steps**

As part of our zero tolerance approach to modern slavery and to ensure that we continue to reinforce our zero tolerance approach, in the next 12 months we intend to take the following steps:

- continue to monitor our contracts with contractors, consultants and housebuilders relating to obligations with respect to modern slavery and ethical labour standards (alongside the commitment we already have to the use of a minimum level of local labour at our sites);
- carry out an annual review of compliance data of contractors, housebuilders and consultants;
- update our Ethical Labour policy to include wider commitments as to the ethical labour standards we require all of our principal contractors, housebuilders, consultants and suppliers to achieve. We intend to call this our “Ethical Labour Policy” and through our contract terms we will oblige all of our principal contractors, housebuilders, consultants and suppliers to comply with it going forwards;
- build on the current data gathering for our principal contractors, consultants and housebuilders to provide annual declarations that they continue to comply with the contractual modern slavery obligations, the Modern Slavery Act 2015 and our Ethical Labour Policy;
- ensure that the data collection for housebuilders is consistent with that of the contractors and consultants;

- identify opportunities for enhanced training on modern slavery issues on a site-by-site basis;
- engagement with local police forces to provide briefings to Consortia meetings to raise awareness of issues relating to modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30 September 2020. It was approved by the Board of Directors on 21 April 2021.

**Peter Pereira Gray**

**Chairman of the Board of Directors of Urban&Civic plc**

**21 April 2021**