

Anti-Slavery and Human Trafficking Policy



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1

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1 The Policy

- 1.1 It is the policy of Peel L&P Group Management Limited, Peel Group Management Limited (Peel) and its subsidiary companies to conduct all of its business in an honest and ethical manner. Peel takes a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity in all its business dealings and relationships. This includes implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.
- 1.2 The Company will uphold all laws relevant to the content of this policy in all the jurisdictions in which it operates. The Company does, however, remain bound by the laws of the UK in respect of its conduct both at home and abroad.
- 1.3 Peel recognises that breach of these policies can lead to:
 - 1.3.1 harm to victims of modern slavery and human trafficking
 - 1.3.2 fines;
 - 1.3.3 imprisonment;
 - 1.3.4 excluded from tendering for public contracts;
 - 1.3.5 serious reputational damage.
- 1.4 This policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, development partners or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). These policies also apply to Officers, Trustees, Board, and/or Committee members at any level. The Company requires all to act honestly and with integrity and to safeguard our integrity and approach.
- 1.5 In the context of these policies, third-party refers to any individual or organisation we meet and work with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

- 1.6 Any arrangements Peel makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to these policies. These policies can be found in the Supply Chain Code of Conduct.
- 1.7 Peel is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Peel expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect that its suppliers will hold their own suppliers to the same high standards.
- 1.8 As part of Peel's contracting processes, we require that relevant and compliant policies and procedures are maintained and enforced relating to such matters and prohibit any activities, practices or conduct which may constitute or cause any breach of, or offence under, any such laws, statutes, regulations, codes, policies and procedures. We also expect that its consultants, advisers, contractors, suppliers and other business partners will hold their own contractors, suppliers and other business partners to the same high standards.
- 1.9 These policies should be read in conjunction with all related employee policies available on the intranet.

2 Definition of Slavery and Human Trafficking

- 2.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain, such as:
 - 2.1.1 slavery;
 - 2.1.2 servitude;
 - 2.1.3 forced and compulsory labour;
 - 2.1.4 and human trafficking.

3 Policy Aims and Objectives

- 3.1 The key aims and objectives of this policy is:
- 3.1.1 to set out our responsibilities, and of those working for Peel, in observing and upholding its position on anti-slavery and human trafficking;
 - 3.1.2 provide information and guidance to those working for Peel on how to recognise, deal with and report any concerns that they may have about inappropriate behaviour purporting to slavery and human trafficking;
 - 3.1.3 to establish the principle that slavery and human trafficking will not be tolerated across Peel;
 - 3.1.4 to clarify the action(s) Peel will take against anyone found guilty of or attempted slavery and human trafficking;
 - 3.1.5 to set out a framework for a fast and appropriate response to instances of alleged slavery and human trafficking issues.
- 3.2 The overall objective is to limit Peel's exposure to slavery and human trafficking issues and thus to minimise the risk to victims affected and the also the risk of related financial loss and/or adverse effects on our image, reputation and its employees.

4 Compliance with the Policy

- 4.1 Employees must ensure that they have read, understood and complied with this policy.
- 4.2 The prevention, detection and reporting of slavery and human trafficking in any part of Peel are the responsibility of all those working for Peel or those under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 Employees are encouraged to raise concerns about any issue or suspicion relating to a breach of any of this policy even if the employee is unsure about whether a particular act constitutes a breach of policy. The Associate Director for People and Compliance must be notified at the earliest possible stage if it is believed or suspected that a conflict with this policy has occurred or may occur in the future. Employees may also report it in accordance with Peel's Whistleblowing Policy.

- 4.4 An employee who breaches any of these policies may face disciplinary action, which could result in dismissal for gross misconduct.

5 Raising Concerns

- 5.1 Employees are an important element in our stand on slavery and human trafficking. Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Should an employee be unsure whether a particular act constitutes a breach of any of these policies, or if they have any other queries, these should be raised with at least one of the following parties:
- 5.1.1 the employee's Line Manager;
 - 5.1.2 People Team (peopleteam@peel.co.uk);
 - 5.1.3 Directors or a member of the Senior Management Team;
 - 5.1.4 In confidence via the hotline managed independently by Safecall (0800 915 1571)
 - 5.1.5 Public Concern at Work charity (<http://www.pcaw.co.uk>).
- 5.2 If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chain constitutes any of the various forms of modern slavery, employees are asked to raise it with their Line Manager, the Company Secretary or through the confidential helpline, Safecall.
- 5.3 Employees should refer to the Whistleblowing Policy for further advice on how to raise concerns.
- 5.4 Concerns raised will be treated in confidence and will be properly investigated. However, if any allegation made by an employee is identified as unfounded and malicious this will be dealt with as a disciplinary matter.
- 5.5 Where, after a proper audit investigation has been carried out, there is evidence that slavery and human trafficking impropriety has occurred we will normally expect the circumstances to be referred to the Police for advice, further investigation and if considered appropriate by the Crown Prosecution Service prosecution of the offender.
- 5.6 Where it is found that slavery and human trafficking has occurred due to a breakdown in Peel's systems or procedures the Directors, in consultation with the Finance & Operations Director, are responsible for

ensuring that appropriate improvements in systems of internal control are implemented in accordance with audit recommendations.

- 5.7 With regard to whistleblowing, more information around raising a concern and protection is provided within the Whistleblowing Policy.

6 Protection

- 6.1 Employees who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Peel aims to encourage honesty and transparency and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 6.2 Peel is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in slavery and human trafficking activity or because of reporting in good faith their suspicion that an actual or potential offence has taken place or may take place in the future.
- 6.3 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should inform their Line Manager (or, if the complaint relates to their manager, to the People Team) immediately. If the matter is not remedied, it should be raised formally using the Grievance Procedure.

7 Training and Communication

- 7.1 Training on this policy forms part of the induction process for all new employees. Employees will also receive regular, relevant training on adherence to this policy particularly where it is felt knowledge needs to be enhanced or those identified with or exposed to higher risk work activities. Employees will be asked to formally accept that they comply with this policy annually.
- 7.2 Peel maintains a zero-tolerance approach to slavery and human trafficking whether under UK law or under the law of any foreign country. This must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and as appropriate thereafter as set out in the Supply Chain Code of Conduct.

8 Responsibility for these Policies

- 8.1 The Board Directors of have overall responsibility for ensuring this policy complies with Peel's legal and ethical obligations, and that all those under Peel's control comply with them.
- 8.2 Peel is committed to ensuring there is transparency in its own businesses and in its approach to tackling slavery and human trafficking throughout its supply chains consistent with its obligations under the Modern Slavery Act 2015.
- 8.3 All senior management have primary and day-to-day responsibility for implementing this policy, monitoring their use and effectiveness, dealing with any queries and ensuring internal audit of control systems and procedures to ensure they are effective in countering slavery and human trafficking.
- 8.4 Management at all levels are responsible for ensuring those reporting to them are made aware of and understand these policies and are given adequate and regular training on them.
- 8.5 Peel believes that all its employees at any level of management have a general responsibility to implement this policy in their day to day activities.

9 Monitoring and Review

- 9.1 The Associate Director of People and Compliance will monitor the effectiveness and review the implementation of these policies, regularly considering their suitability, adequacy and effectiveness.
- 9.2 Any improvements identified will be made as soon as possible.
- 9.3 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering slavery and human trafficking.
- 9.4 All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- 9.5 Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Associate Director of People and Compliance.



9.6 This policy does not form part of any employee's contract of employment and it may be amended at any time.

10 Contacts

10.1 Peel's internal contact for this policy is The Associate Director of People and Compliance.

10.2 External contacts for this policy are:

Safecall (Confidential)

0800 915 1571

Public Concern at Work (Confidential Charity)

<http://www.pcaw.co.uk>