

**THE HOWARD DE WALDEN ESTATE – MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT  
(FOR FINANCIAL YEAR END 31 MARCH 2021)**

**1. Summary**

The United Kingdom Modern Slavery Act 2015 (“MSA”) requires certain companies to provide disclosure concerning their efforts, if any, to ensure there is no modern slavery or human trafficking in their organisation or supply chain.

The following is the statutory statement by Howard de Walden Estates Limited (the “Estate”) made pursuant to Section 54 of the MSA (“S 54”) having been adopted by a meeting of the board of directors of the Estate. The statement has also been approved by Howard de Walden Estates Holdings Limited, the 100% parent company of the Estate.

While only the Estate and Howard de Walden Estates Holdings Limited are required to make a disclosure under Section 54, the statement reflects the practices of the group and its subsidiaries (who are referred to collectively in this statement as the “Estate”).

**2. Description of business and supply chain**

**2.1 Description of business and policies relating to slavery and human trafficking**

The Estate is the freehold owner of most of the buildings in ninety-two acres of Marylebone, central London. It manages and leases properties across an area that extends from Marylebone High Street in the west to Portland Place in the east and from Wigmore Street in the south to Marylebone Road in the north. The Estate adopts a zero-tolerance stance in relation to modern slavery. The Estate has therefore adopted an anti-slavery policy to set out its values in relation to these issues. The intention is to create a clear declaration of principles which leaves no doubt as to our stance.

**2.2 Description of Howard de Walden group structure**

The Estate’s corporate group includes Howard de Walden Estates Holdings Limited, Howard de Walden Estates Limited and its subsidiary companies who are identified in the group accounts.

**2.3 Description of our supply chain**

The Estate has a wide range of suppliers. Prominent members of our supply chain include construction and building maintenance contractors, sub-contractors and workers from the UK and the rest of the world, as well as suppliers of materials and equipment for construction and building maintenance activities and employment agencies providing recruitment and staffing services.

The Estate also deals with suppliers of business inputs such as physical office premises, information technology, professional service providers, advisors and specialist consultants. By way of further strengthening its policies and procedures, the Estate has adopted provisions in its contracts with suppliers, which impose obligations on the supplier to cooperate with the Estate’s audit practices.

**3. Details of checks and due diligence conducted on members of the supply chain**

The Estate has put in place practices in order to protect the high levels of quality expected by the Estate and aims to improve these further. The Estate has put in place processes to audit suppliers with regard to their practices on modern slavery and human trafficking.

During the course of the financial year, as with previous years, the Estate followed up on any questionnaire responses it considered to be unsatisfactory in order to seek the necessary clarifications and additional information to obtain assurances that suppliers did not pose a risk of slavery or trafficking.

The Estate is prepared to terminate its relationship with suppliers which may have a connection with any perceived risk of human trafficking or modern slavery practices in any part of the world. It is tightening up contractual provisions with suppliers in order to facilitate this possibility where deemed appropriate. During the

course of this year, the Estate has continued mandatory screening for all new suppliers, which requires them to submit to slavery and trafficking checks before joining the Estate's supply chain.

The Estate also continues to require its construction contractors to display posters raising awareness of slavery and trafficking issues on sites related to the Estate's projects. We have furthermore taken steps to strengthen contractual controls on contractors to assist us in ensuring that slavery does not occur on site.

We are pleased to note that, six years after the introduction of the MSA our suppliers have shown an increased awareness of the MSA and have taken greater efforts to comply with the statute. A number of our suppliers have now sought modern slavery accreditation with professional supply chain management organisations. In terms of responses to our due diligence enquiries, we are also receiving a growing number of referrals by suppliers to their S 54 statements.

Whilst this represents good progress, we recognise the continued need to exercise vigilance in verification of members of our supply chain. We have recognised, as stated elsewhere in this Statement, the risk of an occurrence of domestic servitude in properties owned or managed by us. To mitigate that risk, we have provided enhanced training to staff on the issue of domestic servitude. We have also moved to incorporate within certain tenancy agreements clauses which would require tenants to respond to any enquiries we may have regarding suspected domestic servitude.

#### **4. Training**

Prior to the 2020/2021 financial year, senior members of the Estate's supply management team had already taken detailed advice in relation to the issues of modern slavery and human trafficking and this was followed by refresher training. In previous financial years, it introduced training for all of its key staff involved in human resources, procurement and supply chain management

The level of training needed will be proportionate to the role of the member of staff concerned and the likelihood of them becoming exposed to instances of modern slavery or human trafficking in carrying out their everyday duties. The Estate's senior management team has committed to expanding the number of training sessions we carry out for staff and to expanding the awareness of slavery issues ever further amongst our staff at all levels. Last year due to the lockdown and restrictions on movement caused by the COVID-lockdown, the Estate changed its training schedule shortly following the close of the current financial year. It commissioned on-line training on slavery and trafficking which could be rolled out to new members of staff and provided on a more flexible basis generally. This year, the Estate has re-scheduled in person training for all staff.

The training highlights to staff the risks around domestic servitude in the Estate's properties. We wish for our staff to be able to recognise any signs of this abhorrent and unacceptable practice and to report these within the Estate. The Estate will then consider reporting suspicions to law enforcement agencies.

#### **5. Employment**

In the context of its own organisation, the Estate is committed to the principle that those who work for it or for any contractor or supplier must have chosen their work freely and must be treated with dignity. The Estate is also committed to paying its workers no less than the applicable living wage and ensuring that best practice is applied in respect to working conditions, workplace treatment and values of respect, diversity and non-discrimination.

#### **6. Violations**

The Estate will take very seriously any actual or potential instance of suppliers or contractors being involved directly or indirectly in any form of modern slavery or human trafficking. The Estate's response to any such discovery will depend upon a number of factors, including the number of victims involved, the gravity of the human rights violations concerned, whether the supplier was involved directly or indirectly and whether or not the supplier has previously been involved in such conduct.

Where practicable, the Estate will aim to work with the supplier and to provide it with assistance to adopt the Estate's values and best practices.

As a general principle, the Estate expects its suppliers to be well-informed with regard to the workings of their own supply chain and with the risk of slavery. It therefore takes seriously any instance of suppliers refusing to co-operate with its due diligence enquiries.

We are pleased to report that there were to our knowledge no violations of our policy during the 2020/2021 financial year.

Furthermore, the Estate will not tolerate any of its officers or employees being involved in modern slavery or human trafficking. Any such employee will be subject to serious disciplinary actions in accordance with our employment manual and contract of employment.

As indicated above, we have taken additional measures regarding domestic servitude and construction contractors.

The Estate also has a whistleblowing policy through which employees can raise any suspicions they may have from time to time that modern slavery or human trafficking may be taking place in the Estate's organisation or supply chain. Employees will be reassured that where suspicions are reported in good faith, they will receive no sanction if these ultimately turn out to be unfounded. In appropriate circumstances, the Estate is willing to share slavery or trafficking related intelligence with law enforcement agencies regarding slavery or trafficking.

## **7. Risk assessment**

As reported in its previous statements issued pursuant to S 54 MSA, the Estate continues to regard its procurement function and supply chain management as the principal areas of risk for the business. As a property owner, the Estate also needs to be alive to the risk of domestic servitude occurring within its properties. The inclusion of clauses in leases requiring occupants to provide information to assist us in the detection of domestic servitude is an example of how we have set about this task.

The risk assessment process looks at sectors and industries and their relative slavery and trafficking exposure. In this regard, the Estate continues to identify as areas of elevated risk the supply of labour to contractors and sub-contractors within the construction industry. We are aware of very serious occurrences of modern slavery and human trafficking abuses by employment agencies in the construction sector. For these reasons, suppliers in these categories are an important (but not the sole) area of our due diligence and audit efforts.

The Estate also applies close scrutiny to those suppliers who are known to operate, directly or indirectly, in areas of the world where the Global Slavery Index (GSI) has found there to be a higher level of risk. However, the exposure of our supply chain to areas of higher risk is very limited.

The Estate also recognises that its supply management and human resource departments could also be at risk of exposure to slavery and trafficking (more specifically in terms of the discovery of victims) by virtue of the roles they carry out.

We also want to ensure staff inspecting our leased properties recognise the potential indicators of domestic servitude. Whilst the Estate's staff recruitment and retention policies are legally robust, the Estate recognises the need to be vigilant when using staff that have been engaged through agencies, which may not necessarily adopt the same values or care as the Estate in their engagement or referral of staff.

As we have said in previous statements, the Estate accepts that any risk assessment must be reviewed regularly to take account of any new information regarding modern slavery and human trafficking.

## **8. Effectiveness of policies**

We will keep our slavery and human trafficking policies and due diligence processes under review to ensure their effectiveness in achieving the desired results.

The Estate applies the following key performance indicators ("KPIs") as metrics to determine whether the Estate's policies and procedures are producing the desired effect:

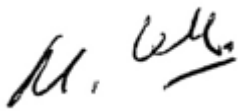
1. audits having been completed on a significant number of suppliers within the relevant financial year;
2. the audit process not having given grounds for any concerns regarding modern slavery or human trafficking and the Estate not having otherwise received reports of suppliers being complicit in such practices (or where such concerns have arisen, these have ultimately been addressed through effective remedial measures or resolved through further enquiries);
3. training has been provided to all key procurement and supply management personnel as well as other members of staff, and
4. the Estate has operated a whistleblowing facility for staff to enable them to report suspicions of modern slavery or human trafficking occurring within the Estate's business or supply chain.

We are satisfied that for the financial year 2020/2021, these KPIs are met.  
Any questions or queries in relation to this statement should be directed to:  
[antislavery@hdwe.co.uk](mailto:antislavery@hdwe.co.uk)

Signed on behalf of

**Howard de Walden Estates Holdings Limited; and**

**Howard de Walden Estates Limited**



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**Mark Kildea**  
Chief Executive

**[Statement ends]**