

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

(for the financial year ended 31 March 2017)

1. Summary

The United Kingdom Modern Slavery Act 2015 requires certain businesses 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 Modern Slavery Act 2015 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 as a whole.

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 92 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 our 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 group consists of Howard de Walden Estates Holdings Limited, Howard de Walden Estates Limited and various other group 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 and sub-contractors 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 and office supplies. We require high standards of our supply chain which we have now set out in a Code of Conduct for Suppliers.

By way of further strengthening its policies and procedures, the Estate is looking to adopt new provisions in its contracts with suppliers which impose obligations on the supplier to cooperate with the Estate's audit practices and to comply with its Code of Conduct for Suppliers. Furthermore, the Estate intends to include questions to suppliers on slavery and trafficking in its future tendering documents as part of a screening of new suppliers.

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

The Estate has adopted practices in order to protect the high levels of quality expected by the Estate and even to improve these further.

The Estate carries out audits on suppliers with regard to their practices on modern slavery and human trafficking. It has required a number of its suppliers (including all key suppliers and those operating in areas of elevated slavery risk) representing 85% of the Estate's total spend to submit to these verification processes by filling in questionnaires for examination by the Estate (increased from 80% in the previous financial year). The Estate is prepared to terminate its relationship with suppliers where they may have a connection with any perceived risk of human trafficking or modern slavery practices in any part of the world.

In addition, the Estate has impressed upon suppliers its strong expectation that they will provide full and prompt assistance with our audit processes. The Estate has made clear its willingness to cease dealing with suppliers who fail to co-operate in these procedures.

4. Training

Senior members of the Estate's supply management team have already taken detailed advice in relation to the issues of modern slavery and human trafficking. The Estate has rolled out training to all of its key staff involved in human resources, procurement and supply chain management. We have refreshed the training during this financial year to update staff on new developments that have occurred during the financial year.

The level of training needed will be proportionate to the role of the member of staff concerned and the likelihood of their becoming exposed to instances of modern slavery or human trafficking in carrying out their everyday duties.

All other staff have received fact-sheets about slavery and all staff have been provided with the Estate's anti-slavery policy, with which they are also required to comply.

5. Employment

In the context of our own organisation, we are committed to the principle that those who work for us or for any contractor or supplier must have chosen their work freely and must be treated with dignity. The Estate is 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. 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.

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

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.

7. Risk assessment

The Estate has identified its procurement and supply chain management as the principal areas of risk for the business.

The Estate has identified 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 in certain regions of the globe. 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.

The Estate also recognises that its supply management and human resource divisions could also be at risk of exposure to slavery and trafficking by virtue of the roles they carry out. 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.

This said, we believe 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

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

We will apply the following 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 (with the aim to increase the number year on 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;
3. The completion of training for all key procurement and supply management personnel as well as other members of staff, and
4. The operation of 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 pleased to report that the Estate has fulfilled all of the KPIs which it set out in the previous financial year.

Any questions or queries in relation to this statement should be directed to: antislavery@hdwe.co.uk

Signed on behalf of Howard de Walden Estates Holdings Limited:



Signature

A.G. HYNAN

Name

Signed on behalf of Howard de Walden Estates Limited:



Signature

A.G. HYNAN

Name