

## MODERN SLAVERY POLICY

### 1. Introduction

Modern slavery is extremely prevalent across the globe. It is estimated that there are almost 35 million people in forced labour in the world today<sup>1</sup>. The UK is not immune – over 1,700 cases were reported in 2013<sup>2</sup>. Modern slavery takes various forms, including:

- **Slavery**, where a person behaves as if they own the victim, depriving them of their freedom;
- **Forced or compulsory labour**, where a person is forced to work under threat or against their will; and
- **Human trafficking**, where a person arranges or facilitates the travel of another person with a view to that person being exploited.

All of which involve the depriving a person of their freedom for personal or commercial gain, and all of which are criminal offences which can lead to life imprisonment.

Stanhope is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same standards from all of our contractors, consultants, suppliers and other business partners. This policy applies to all people working for us or on our behalf in any capacity, including employees, seconded workers and interns as well as agents, contractors, sub-contractors, consultants, suppliers and business partners with whom we work. You must ensure that you read, understand and comply with this policy. Its purpose is to:

- Set out responsibilities to observe and uphold our position on modern slavery; and
- Provide information and guidance on how to recognise and deal with modern slavery issues.

### 2. Procedures

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

#### a) Employee checks

Stanhope's policy is to, and we expect our contractors, consultants and suppliers to, make the following checks to protect their employees:

- **Contract** – check that all staff, including agency workers, have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- **Right to work** – make sure staff are legally able to work in the UK and that any recruitment agency has provided assurance that appropriate checks have been made on the person they have supplied.
- **Statutory rights** – make sure your workers know their statutory rights, including sick pay, holiday pay and any other benefits they may be entitled to.

#### b) Continuous vigilance

You should be vigilant about identifying situations where modern slavery may be occurring, whether within your own business or supply chain, and consider taking action if you spot signs such as:

<sup>1</sup> <http://www.globalslaveryindex.org/>

<sup>2</sup> <https://modernslavery.co.uk/>

- A worker's legal documents (passport, identification, bank account details etc) being held by another person.
- Groups of workers being dropped off or picked up together at unusual times of the day, or picked up from / taken to the same property together.
- Workers looking malnourished or unkempt, or suffering from physical injuries.
- Workers appearing withdrawn, frightened, or providing inconsistent information.

c) Training and communication

Stanhope's policy on modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them (and reinforced as appropriate thereafter). This should be achieved either by providing the relevant supply chain member with a copy of this policy, or by directing them to the file hosting service on which copies of all Stanhope's policy documents, including this one, will be stored.

Training on this policy, and on the risks businesses faces from modern slavery in their supply chains, will form part of the induction process for all individuals who work for Stanhope, with any further training provided as necessary.

d) Whistleblowing

We want to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers detrimental treatment as a result of reporting in good faith their suspicion that modern slavery may be taking place in any part of our own business or in any of our supply chains.

If a claim or allegation is made and subsequently found to be malicious or vexatious, however, we reserve the right to take disciplinary action against the individual(s) making the claim/allegation.

### 3. Responding to a suspicion of modern slavery

a) Stanhope employees, seconded workers, business partners and agents

You must raise any concern about any issue or suspicion of modern slavery at the earliest opportunity to a member of Stanhope's Compliance Team (Mark Ridley, Rob Watts, Ron German, Clare Pagan and Kate Young) - see "*Monitoring and Review*", below. If you are unsure whether a particular act constitutes modern slavery, or if you have any other queries, you should also contact a member of the Compliance Team.

b) Contractors, sub-contractors, suppliers and consultants

In an emergency

If you suspect that you have identified a specific case of modern slavery here in the UK, and the potential victim(s) are in immediate danger, you should use the standard 999 emergency number.

All other cases

In all other cases, you should immediately report your concern to the police by dialling 101, or by calling the Modern Slavery Helpline on 0800 0121 700. You must also promptly report your concern and course of action to your project contact at Stanhope. Stanhope may from time to time require you to provide information to confirm to Stanhope's reasonable satisfaction that you (and your suppliers, consultants, contractors and sub-contractors) have complied and are complying with this policy.

### 4. Monitoring and review

The Compliance Team will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be implemented as soon as possible.