



## **STATEMENT OF PEEL GROUP MANAGEMENT LIMITED ON BEHALF OF THE PEEL GROUP PURSUANT TO THE MODERN SLAVERY ACT 2015 (“THE ACT”)**

This is the Modern Slavery and Human Trafficking statement of Peel Group Management Limited (Peel) made on behalf of The Peel Group and wholly owned UK companies. This statement is made pursuant to Section 54, part 6 of the Modern Slavery Act 2015 (the ‘Act’) and has been adopted by Peel as its slavery and human trafficking statement for the financial year ending 31 March 2024.

### **Organisation Structure**

The Peel Group was established over 50 years ago and has grown through an ethos of recycling capital into long-term sustainable investments gaining a reputation for visionary regeneration projects, particularly in the north of England.

Its investments span land and property, transport and logistics, low carbon energy and other essential infrastructure. Its strategic aim is to grow the value of its investments by recycling capital back into long term sustainable projects within its businesses.

Peel is committed to ensuring, as far as practically possible, that there is no modern slavery or human trafficking in the supply chains of its wholly owned UK subsidiaries.

This statement relates to Peel and to those of Peel’s wholly owned UK subsidiaries which do not publish a separate Modern Slavery and Human Trafficking Act Statement.

### **Policies**

Policies are in place and reviewed regularly in relation to employee conduct and welfare. In addition, a separate Anti-Slavery and Human Trafficking Policy has been issued to all employees and is included in the induction process.

All of our new starters are required to read, and acknowledge that they have done so, each of the policies referred to above.

The following policies are considered to be of particular importance in tackling modern slavery and human trafficking:

- Supply Chain Code of Conduct Policy which provides a set of rules to ensure that all employees uphold the highest level of ethical conduct in their day-to-day business;
- Equality Policy which aims to create a working environment in which all individuals are treated fairly and ethically, able to make best use of their skills, free from discrimination or harassment;
- Whistleblowing Policy which encourages the reporting and exposure of unethical behaviour. All matters raised via whistleblowing or through the auditing processes are diligently investigated and appropriate action taken.



## **Due Diligence**

Due to the diverse nature of the business, our supply chain comes from many different areas. However, in all its dealings with its suppliers Peel strives to ensure that the highest ethical standards are maintained at all times.

Our general conditions of contract make it a requirement that all new suppliers comply with the Act. In addition, as part of our new supplier process, we ensure that any new supplier has confirmed that they comply with the Act before they are accepted as a new supplier. We will continue to review our supplier due diligence processes, our Supply Chain Code of Conduct Policy and our Anti-Slavery and Human Trafficking Policy over the forthcoming year. Existing suppliers will be notified of the updated policy and if they continue to carry out work on behalf of Peel then they will be deemed to confirm acceptance of and compliance with it.

As expected of any responsible employer, we have recruitment systems in place to prevent forced labour and to ensure that all employees are entitled to work in the UK. We ensure that all people directly employed by Peel do so at their own free-will and understand that they can cease their employment at any time under the terms of their employment contract. We compensate all our directly employed people with salaries and benefit packages that meet or exceed statutory minimum requirements. We abide by the Working Time Directive, unless people directly employed by Peel voluntarily choose to opt-out (within the limitations imposed by the Working Time Directive).

## **Risk Management and Effectiveness**

Peel continually reviews its various systems and processes to provide assurance that our risk management governance and internal control processes are operating effectively in accordance with the Codes of Professional Conduct and Ethics and International Standards governed by the Chartered Institute of Internal Audit (CIIA).

Although we see our business as low risk in relation to the threat of slavery and human trafficking offences, we are fully committed to ensuring that both Peel and its suppliers comply with the Act.

## **Training**

Our People Team has carried out a review of our employee development programme and we have successfully rolled out online Modern Slavery training across the wholly owned UK businesses which will continue annually.

This statement has been considered and approved by the Company's Board of Directors.

A handwritten signature in black ink, appearing to be a stylized 'S' followed by a horizontal line.

Director

For and on behalf of Peel Group Management Limited

21<sup>st</sup> March 2024