

SLAVERY AND HUMAN TRAFFICKING STATEMENT (2022/23)



Property Alliance Group (“PAG”) and its associated companies are committed to the highest level of ethical standards and governance. We have zero tolerance towards modern slavery and human trafficking and all forms of bribery and corruption associated with such activities. We will ensure that we comply with all legal and regulatory responsibilities including the Modern Slavery Act 2015. We will also take care to ensure that slavery and human trafficking does not exist in any part of our business or wider supply chain.

We expect our suppliers to share our commitments and approach as stated in the below guidelines. We expect them to adhere to the guidelines of this Code and that they expect these requirements also of their supply chain, including sub-contractors.

Our business and structure

We are a property development company, with a portfolio of commercial and residential projects across Manchester and the North West, and a presence in many other towns and cities throughout the UK. We are the ultimate parent company of the Property Alliance Group (“Group”). We have our head office in the UK and have over 60 employees across the Group.

Our supply chains

Our supply chains include funders, contractors, sub-contractors, material suppliers, consultants, tenants and joint venture partners.

Our policies on slavery & human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies. In finance year 2022 / 2023 we plan to implement an Anti-Slavery and Human Trafficking Policy. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We also have the following policies / procedures in place relevant to modern slavery, which we continuously review and update:

- Conduct at Work Procedure
- Equal Opportunities & Discrimination Policy
- Harassment Policy
- Anti Bribery & Corruption Policy
- Communications & Representation Policy
- Public Interests Disclosures Policy (Whistleblowing) Policy
- Slavery & Human Trafficking Policy
- Supplier Code of Conduct

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Due diligence processes for slavery & human trafficking

We understand that the following areas give rise to the highest modern slavery risks:

Due to the professional services nature of our work, we believe the risk associated with slavery and human trafficking within our business is relatively low. We consider the key risk areas lie within our supply chain and our recruitment processes. We manage these risk areas through the procedures referred to within this Statement.

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Prohibit discrimination through our Equal Opportunities Policy
- Prohibit corruption and bribery through our Anti-Corruption and Bribery Policy
- Enable our workforce to raise concerns through our Grievance Policy and our Anti-Corruption and Bribery Policy.

We also carry out training for all staff on awareness of the Act.

Supplier adherence to our values & ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values the Board of Directors are responsible for compliance in the following areas.

- Legal
- Audit and Compliance
- Human resources
- Procurement
- Sales

We also intend to implement the roll out of a Supplier Code of Conduct, carry out regular site inspections. We already provide a system to allow for confidential worker feedback (whistleblowing).

We intend to roll out a Supplier Code of Conduct which we would expect every supplier to acknowledge and sign up to, to extend their commitment to respect human rights and to operate their business in accordance with the Modern Slavery Act 2015.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

We also require our business partners to provide training to their staff and suppliers and providers, as covered in our Supplier Code of Conduct.

Our effectiveness in combating slavery & human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Vetting procedures and Supplier screening by way of our Supplier Code of Conduct
- Whistleblowing Policy within the Company's Employee Handbook
- Training on Modern Slavery & Trafficking to all members of staff
- Annual review of the Company's Supplier Code of Conduct and Slavery & Human Trafficking Policy

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Next Steps

We intend to take the following further steps to combat slavery and human trafficking:

The Company will continue its commitment to tackle modern slavery in the next financial year by continuing to train staff, advise suppliers to adopt a Code of Conduct, by monitoring and identifying risks and to continue to update our standard agreements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 29 June 2023. It was approved by the board on 9 May 2022.

Ella Magill (Director)
Property Alliance Group Limited
Date: 9 May 2022