

## **Modern Slavery Statement**

### **Scope**

This statement applies to London & Cambridge Properties Limited and all of its subsidiary companies that supply goods or services within the UK and which are listed in the annexure hereto (collectively referred to within this statement as the “Group”). The information included in the statement refers to the financial year 1 April 2023 to 31 March 2024.

### **Introductory Statement**

The Group is committed to improving its practices to combat slavery and human trafficking in its business and supply chain.

### **Organisational Structure**

The Group was established in 1987 and is a leading privately owned investment and property management company operating in key locations throughout the UK, Poland, Romania and Germany.

Its principal activities include the acquisition and management of commercial properties along with the provision of associated services. It deploys an intensive property management approach and has a proven track record in improving income and value of assets within a mixed-use property portfolio.

Within the UK its head office is located in the West Midlands, with other offices in Central London, Bristol and Glasgow. The Group also has offices in Warsaw and Dusseldorf.

The Group employs over 300 employees, and this year recorded turnover in excess of £200m.

### **Commitment**

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not knowingly enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to or exceeds the standards required by applicable employment legislation, and generally exceeds the minimum standards required in relation to employees.

## Supply chains

In order to fulfil its activities, the main supply chains of the Group include those related to property and facilities management, construction and building works, asset management and office supplies and professional services providers from various suppliers. The Group understands that its first-tier suppliers may in some cases be intermediary traders and that they therefore have further contractual relationships with lower-tier suppliers.

The Group aims to carry out due diligence processes in relation to ensuring that modern slavery does not take place within its supply chains, including conducting a review of the controls of its suppliers.

## Due diligence procedures

The Group considers its main exposure to the risk of slavery and human trafficking to exist within the supply chain through the delivery of facilities management and construction services (which include the provision of soft services such as cleaning and security, where workers may be sub-contracted from the companies that the Group contracts with, removing them further from the Group's control).

In general, the Group considers its exposure to slavery/human trafficking to be relatively limited and will be further mitigated by the implantation of its Supplier Code of Conduct (see below).

## Steps that the Group has taken to identify and address risks

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015 ("the MSA"), the Group has taken the following steps to ensure that modern slavery is not taking place:

**Risk Assessment:** The Group is committed to assessing the risks within its own business. The Group intends to set up a risk committee, and part of its remit will be to establish a risk framework which will encompass assessing risk in the context of modern slavery.

**Supplier Requirements:** The Group expects all suppliers and business partners within the UK to comply with the MSA 2015 and for all suppliers and business partners within the UK and other jurisdictions to demonstrate transparency, accountability, and ethical sourcing practices. The Group is in the process of developing a Supplier Code of Conduct which will apply throughout its supply chain, and it intends to provide an enhanced disclosure on this in next year's statement.

**Employee Awareness:** The Group will be providing training to employees on the signs of modern slavery and how to report concerns. The training will be mandatory, and staff are required to pass the assessment that follows the training. Those who do not pass must re-take the training until they pass.

**Recruitment Practices:** The Group ensures robust right-to-work checks, fair recruitment processes and protection against hidden labour exploitation. In relation to its own work force, the Group is committed to paying its staff salaries at market levels (and in the case of its UK employees which are no less than the applicable living wage).

## **Policies**

The Group has established policies that are well publicised within the organisation, and which support its commitment to combating modern slavery. These currently apply to the UK subsidiary companies that are listed in the Annexure and equivalent policies are being put in place that will apply to the Overseas subsidiaries that are listed in the Annexure.

**Anti-Bribery, Fraud & Corruption Policy:** Prevents bribery and corruption, which can create vulnerabilities for modern slavery.

**Whistleblowing Policy:** Encourages reporting of concerns, including suspicions of modern slavery.

**Anti-Harassment and Bullying Policy:** Creates a safe working environment and prevents abuse of power.

**Disciplinary Policy:** Addresses misconduct, including any involvement in modern slavery.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

This statement has been approved by the board of directors of London & Cambridge Properties Limited on 10th December 2024.

Signed:

A handwritten signature in black ink, appearing to be 'Ben Lee', written over a horizontal line.

Benjamin Lee  
Group Chief Financial Officer and Director of London & Cambridge Properties Limited

**Date:** 10/12/2024

**Annexure:** Subsidiary Companies to which this statement applies

**UK**

L & C Commercial Ltd  
L & C Investments Ltd.  
L & C Securities Ltd.  
LCP Commercial Ltd.  
LCP Developments Ltd.  
LCP Estates Ltd.  
LCP Management Limited  
LCP Properties Ltd.  
LCP Property Investments Ltd.  
LCP Retail Ltd.  
LCP Retail Properties Ltd.  
LCP Securities Ltd.  
Rookman Properties Ltd.  
Wellington Real Estate Ltd.

**Overseas**

**Poland:**

LCP Properties Sp. Zo.o. - Provision of management services  
LCP Taima Investments Sp. Zo.o.  
LCP Corentin Investments Sp. Zo.o.  
LCP Estelle Investments Sp. Zo.o.  
LCP Tredia Investments Sp. Zo.o.  
LCP Xantira Investments Sp. Zo.o. Sp.K  
LCP Properties Management Sp. Zo.o.  
LCP Syncerus Investments Sp. Zo.o. Sp.K.  
LCP Beeston Sp. Zo.o.  
LCP Cintra Sp. Zo.o.  
LCP Colburn Sp. Zo.o.  
Axbridge Sp. Zo.o.  
LCP Zane Sp. Zo.o.  
LCP Zaragoza Sp. Zo.o.  
LCP Zarqa Sp. Zo.o.  
LCP Zenica Sp. Zo.o.  
Kennford Sp. Zo.o.  
LCP Arrington Sp. Zo.o.  
LCP Manston Sp. Zo.o.  
LCP Stamford Sp. Zo.o.  
LCP Murton Sp. Zo.o.  
LCP Redmoor Sp. Zo.o.  
LCP Disley Sp. Zo.o.  
LCP Arenig Sp. Zo.o.  
LCP Ganavan Sp. Zo.o.  
Rondinella Sp. Zo.o.  
LCP Lemnas Sp. Zo.o.  
Aldford Sp. Zo.o.  
Arthill Sp. Zo.o.

**Germany:**

GIPAM GmbH

LCE Deutschland Eins GmbH & Co KG

LCE Deutschland Zwei GmbH & Co KG

LCE Deutschland Drei GmbH & Co KG

LCE Deutschland Vier GmbH & Co KG

LCE Deutschland Fuenf GmbH & Co KG

LCE Deutschland Sechs GmbH & Co KG

LCE Deutschland Sieben GmbH & Co KG

LCE Deutschland Acht GmbH & Co KG

**Luxembourg:**

L & C Lux Hold Co S.A.R.L.

LCE Allemagne 1 S.A.R.L.

LCE Allemagne 2 S.A.R.L.

LCE Allemagne 3 S.A.R.L.

LCE Allemagne 4 S.A.R.L.

LCE Allemagne 5 S.A.R.L.

LCE Allemagne 6 S.A.R.L.

LCE Allemagne 7 S.A.R.L.

LCE Allemagne 9 S.A.R.L.

LCE 7 Luxembourg GP S.A.R.L.

**Romania:**

LCP Romania S.A.

Intercora Property S.R.L

Avocado Development S.R.L

Apple Development S.R.L

Mango Development S.R.L

Orange Development One S.R.L

Alpha Real Estate Investment S.R.L

S7 Giurgiu Property S.R.L

APG Development Slatina S.R.L

APG Tulcea S.R.L

APG Development Targu Mures S.R.L

Pipera Retail Development One S.R.L

S7 Parks S.R.L

LCP Development Beta S.R.L.

LCP Development Gamma S.R.L.