

Foxtons Group plc Modern Slavery and Human Trafficking Statement

Introduction

Foxtons Group (the "Group") does not tolerate modern slavery or human trafficking in our organisation or in our supply chains. This statement sets out the steps taken to identify the areas within the business that may be exposed to these risks and how it ensures they are eliminated, as far as possible.

This statement, which is for the financial year ended 31 December 2018, is made pursuant to section 54(1) of the Modern Slavery Act 2015 by Foxtons Group plc and other relevant Group companies.

Group Structure

The Group includes two operating subsidiaries, Foxtons Ltd and Alexander Hall Associates Ltd. Foxtons Limited is an estate, letting and property management agency with a growing branch network within the London, Surrey and Essex regions. Alexander Hall Associates Ltd is a mortgage broker. The Group's headquarters is located in Chiswick, London. The Group employs over 1,000 members of staff.

Supply Chains

Our suppliers include services to assist both our business and our customers. These comprise:

- catering and cleaning,
- suppliers of professional services (software & IT, legal, accountancy, insurance),
- vehicle suppliers,
- office services (fitters, cleaners, support services),
- telecoms providers, board/sign companies,
- website aggregators, local authorities.

Services that we procure to assist our customers include property management services and trades, across all relevant sectors.

Policy on Slavery and Human Trafficking

The Board of Directors has examined the risk of modern slavery within the Group and considers the risk to be low. This assessment is based upon the nature of the business which is a service, based in and operating almost exclusively within London, UK. The Group's standard practice is to check that prospective employees have the right to work in the UK. We do not generally employ agency staff. Where we work with suppliers, these are generally large organisations.

We are committed to conducting our business with honesty and integrity. We adopt and promote a culture of honesty and integrity. We operate a whistleblowing policy, of which all employees are aware and which encourages staff to report illegal activities, suspected wrong-doing or malpractice, including suspected slavery or trafficking issues, as soon as possible.

Due Diligence

We vet parties who want to work with us and expect them to adhere to our policy and principles. We are committed to ensuring that there is no slavery or human trafficking in our organisation or our supply chain. We continue to monitor our supply chain. In the event that we become aware of a modern slavery or trafficking issue within our supply chain we will make every effort to remedy the issue. Before we contract with a supplier we issue them with a Supplier Code of Conduct or suitable Guidelines, as part of which they are made aware of our slavery and trafficking principles and our overall approach to environmental and social governance.

Further steps

We continue to build on our policy by reviewing and reinforcing the steps we take to vet both existing and new suppliers; adopting a risk-based approach, to reduce as far as possible the risk of slavery and human trafficking anywhere in our supply chains.

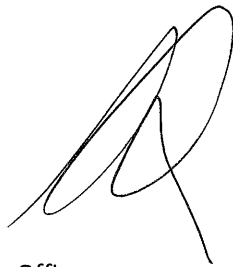
In addition we will ensure that all of our staff understand the risks of modern slavery and human trafficking to our business and supply chains and that they are aware that such practices will not be tolerated.

Approval

This statement was approved by the Boards of Foxtons Group plc and Foxtons Limited on 14 February 2019.

Signed:

Nic Budden

A handwritten signature in black ink, appearing to be 'Nic Budden', written in a cursive style.

Chief Executive Officer,
Foxtons Group plc Director,
Foxtons Limited

14 February 2019