

Modern Slavery and Human Trafficking Statement 2017

Great Portland Estates plc ('GPE') is a property and development company owning, managing and developing real estate solely in central London through its joint ventures and subsidiaries including Pontsarn Investment Limited ('PI'). The Group has around 100 direct employees, based wither at its head office or at buildings within the portfolio.

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 ('the Act') and covers the activities of GPE and PI.

Our supply chain

We are committed to seeking to ensure that there is no slavery or human trafficking within any art of our business or in our supply chains, which include asset management and development contractors, subcontractors, material suppliers and professional services providers. Following a risk assessment, we consider the higher areas of risk to be in relation to our development and refurbishment contractors and sub-contractors, design teams in relation to procurement of materials and certain facilities management suppliers such as cleaning and maintenance due to the diversity of those workforces.

Policies and supply chain due diligence for the year ended 31 March 2017

Under our [Sustainability Policy](#), we expect our suppliers to review their own supply chains to ensure that products and services they use are from responsible suppliers.

In our [Development Brief](#) for all developments and major refurbishments, we have included requirements on responsible sourcing of materials, in particular, the usage of FSC certification with its inclusion of aspects in connection with human rights for communities and forest workers.

Our [Supplier Code of Conduct](#) specifically addresses involuntary, forced, human trafficked or slave labour including indentured, bonded and child labour.

All construction contracts over £250,000 are required to be registered under the Considerate Contractors Scheme, which measures our contractors and construction sites against health and safety and social criteria.

Slavery and human trafficking is a standing agenda item at all our Development Project Principals meetings to heighten awareness of the risk of slavery and human trafficking within ongoing development projects and ensure it is maintained as a focal issue.

Our [Whistleblowing Policy](#) includes specific reference to slavery and human trafficking so that any individual may confidentially raise a potential issue.

¹ For the purposes of this statement, references to slavery and human trafficking are based upon the definition in the UK Modern Slavery Act 2015.

During the year ended 31 March 2017:

- We have required all higher risk suppliers directly contracted by GPE to confirm acceptance and compliance with our Supplier Code and Sustainability Policy. Any supplier which has failed to acknowledge acceptance will not receive any further instructions from GPE.
- All projects completed during the year achieved FSC project certification.
- We undertook a pilot worker engagement audit at one of our construction sites working with our main contractor and covering both main contractor and subcontractor workers on site.
- We incorporated reference to our Supplier Code and Sustainability Policy in all new development and facilities management contracts.

Training

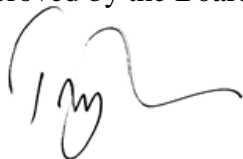
During the year ended 31 March 2017, all employees with direct responsibility for development or asset management activities at our buildings undertook external training on the Modern Slavery Act through sessions bespoke to GPE and our activities. The risks of human trafficking and the Group's related policies were also covered as part of our induction process for all new employees with the Head of Sustainability and Company Secretary.

Ongoing effectiveness

Whilst we have no reason to believe that slavery or human trafficking has occurred within our supply chains based on actions based on the policies, actions and measures taken above, we will work with our development, refurbishment and asset contractors to consider relevant training and to develop best practice in the prevention and protection of slavery and human trafficking within our supply chain. During the year ending 31 March 2018:

- We will undertake a worker engagement audit at all our developments and refurbishments over £5 million;
- we will undertake random audits on wages paid to cleaners working at our buildings to ensure individuals working at our buildings are paid the London Living Wage; and
- a materials procurement risk assessment will be undertaken for all projects at design stage to identify risk within our supply chain.

Approved by the Board and signed on its behalf on 21 September 2017 by



Toby Courtauld
Chief Executive
Great Portland Estates plc



Toby Courtauld
Director

Pontsarn Investment Limited. There is a link to this statement on the GPE website and a copy is available upon written request.