



# Modern Slavery Statement 2023

## Introduction

London Square Limited, its subsidiary companies and their joint ventures, which form the London Square Group ('London Square'), are an award-winning property developer, based in Uxbridge, Greater London.

London Square makes this statement on behalf of the London Square Group of companies, all of whom adopt its terms.

## Supply Chain

The Group's supply chain comprises of a core of approved sub-contractors, suppliers and joint venture partners with whom London Square have long established relationships. As an integral part of the Group's operation, London Square's success and reputation are directly linked to the supply chain's contribution, support and adherence to London Square's ethics and values. The Group seek to work with companies who share our objectives and work in accordance with our policies on health and safety, ethical practice and environmental standards.

London Square continues to strive to Make London Greater, by maintaining collaborative working relationships with all stakeholders and making significant long-term improvements to the environment, as well as the social and economic fabric of the communities in which we work. The Group's commitment to abolish Modern Slavery forms an integral part of this goal.

As a leading London housebuilder, London Square's homes are bespoke and are built using a diverse range of materials from across the globe. This diversity increases the risk of Modern Slavery in our supply chain, in the form of human trafficking and / or child labour. We are proud to therefore say that we have made the commitment to buy more British materials, which as a result, reduces the risk of modern slavery in our supply chain. Currently this commitment extends to bricks, blocks, doors, hardware and sanitary ware.

## Policies and Due Diligence

Our supply chain and sub-contractors are required to confirm that they meet the minimum standards set out in our Social and Ethical questionnaire, which is taken from the Ethical Trading Initiative (ETI) Base Code and international labour laws.

Suppliers and Subcontractors are required to maintain and apply their own ethical sourcing policies.

At the point of publication, 63% of our material and subcontractor supply chain have confirmed that they meet or exceed the Group's standards in relation to Modern Slavery. Those outstanding have been advised that their lack of response / action is jeopardising their future working relationship with London Square. In addition, where we identify a risk within the supply chain, we will work with the supplier to identify appropriate remedial actions.

## Whistleblowing

London Square is committed to conducting business with honesty and integrity and encourages an open and accountable culture in all its dealings. Employees, sub-



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contractors, or suppliers who become aware or are concerned about improper, unethical or illegal behaviour may raise the matter with their Line Manager, or alternatively by telephone, post or email to Scott Brown, Chief Finance Officer 01895 627300.

### Employee Awareness and Training

The Group's Procurement and Commercial teams undertook Modern Slavery Training with the Supply Chain Sustainability School on 30 September 2022. Further to this, in 2023 all employees have been enrolled in dedicated learning pathways with the school, which are specific to their job roles. All pathways include Modern Slavery awareness training, therefore helping to raise awareness of the signs of modern slavery in the workplace.

### Labour & Payroll Auditing

In addition to training, London Square have undertaken a risk review of the Group's supply chain, identifying that the highest risk area for modern slavery to exist at tier 2 is labour supply. The survey acts as a risk analysis, identifying the likelihood of our supply chain containing elements of modern slavery.

The analysis of the supply chain labour survey results did not flag any direct risks of modern slavery; however, the survey did highlight the use of umbrella payroll companies by two providers. Whilst this is not illegal, the Group conducted payroll and labour audits on both companies to ensure that there aren't unreasonable retentions or excessive expenses being paid. In addition, checks were made to ensure best practice measures are in place to minimise the risk of labour gangs being used. It was pleasing to see that one of the providers has a proactive campaign running to raise awareness of modern slavery, including a free confidential reporting and helpline.

### 2023 Actions

- The Group will continue to audit our supply chain's approach to preventing modern slavery through the Social and Ethical Questionnaire and where concerns are identified, audits will take place.
- London Square will continue to encourage our supply chain to access the free resources available, as part of our membership of the Supply Chain Sustainability School, in order to reduce the risk of modern slavery within their business or sub-tiers.
- Modern Slavery Awareness training will be mandatory for all employees.

This statement is pursuant to Section 54 of the Modern Slavery Act and was approved by the Executive Board of Directors for the 2022/2023 year and signed on its behalf by:

A handwritten signature in black ink, appearing to read 'Adam Lawrence'.

**Adam Lawrence**  
**Chief Executive Officer**  
29 September 2023