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# Stratford City JV Business Manager Limited

# Slavery & Human Trafficking Statement

Financial Year Ending 31 December 2022

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# SLAVERY & HUMAN TRAFFICKING STATEMENT

Financial Year ending 31 December 2022

## Introduction

Stratford City JV Business Manager Limited (the **"Company**") supports the objectives of the United Kingdom's Modern Slavery Act 2015 (the "**Modern Slavery Act**"); to detect and prevent the crimes of slavery, servitude, forced or compulsory labour, human trafficking and related and equivalent offiences (collectively the "**Offences**"). The Company supports the related drive to encourage transparency in the supply chaims of commercial organisations so that the commission of Offences can be more easily detected and prevented.

This Slavery and Human Trafficking Statement (the "**Statement**") relates to the Company's activities for the financial year ended 31 December 2022 (the "**Financial Year**").

## Our business and supply chains

The principal business activity of the Company during the financial year ended 31 December 2022 continues to be directly or indirectly acquiring, maintaining and letting property for investment purposes in Westfield Stratford City Shopping Centre.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

## Due Diligence Processes For Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we have taken and will continue to take the following steps:

- We only appoint asset managers and development managers for the business of the Company who are reputable suppliers of such services and who adhere to the Company's approach on modern slavery. The Company's asset and development manager, Westfield Europe Limited ("**WEL"**) (being a group undertaking of Unibail-Rodamco-Westfield S.E., together comprising the "**URW Group**"), has in place policies and continues to comply with its wider URW Group policies, codes of conduct and practices including the following:
    - The URW Group's "Code of Ethics"
    - The URW Group's "Whistleblowing Procedure"
    - WEL's "Modern Slavery Policy" in the UK
    - WEL's "Recruitment Policy" in the UK

- We are satisfied that WEL's policies and its URW Group policies are appropriate and necessary for the discharge of its duties as the Company's asset and development manager.

- Further, we are satisfied that WEL's and the wider URW Group policies contain sufficient steps to deter any breach of such policies. Any failure to comply with such policies will result in discriplinary action up to and including dismissal of any employee or termination of any of the contracts that it has with third parties.

- We are further satisfied that training on anti-modern slavery and human trafficking policies have been undertaken by WEL.

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- As asset and development manager for the Company, WEL procures, on behalf of the Company, other suppliers for the Company's business activities. WEL employs a robust procurement process, including in relation to the issues of modern slavery.

## Modern Slavery Policy

The Company has produced a "Modern Slavery Policy" which includes provisions in respect of the following:

- an overview of the Modern Slavery Act, the Offences and its application to the business;
- outlines the Company's expectations of its suppliers with respect to the detection and prevention of the Offences;
- explains the Company's commitment to ensuring adequate training; and
- summarises the responsibility for compliance with the Modern Slavery Policy.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all our Directors have been briefed on the subject.

## Effectiveness Measurement

The Company does not employ performance indicators specifically in relation to the detection and prevention of Offences in its business and supply chain, but the Company considers that its policies, risk assessment, due diligence, risk management, training and procedures are appropriate and have been and will continue to be effective in detecting and preventing Offences in its business and supply chain. The Company keeps all of its policies and procedures under review in order to ensure their effectiveness and will adapt such policies and procedures as necessary to ensure they remain effective as the businesses that the Company operates and the supply chains employed by the Company in such operation, evolve.

This statement covers 1 January 2022 to 31 December 2022 and has been approved by the board of Stratford City JV Business Manager Limited on 31 March 2023.

DocuSigned by:
Jonathan HODES
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**Jonathan Hodes**
Director
Stratford City JV Business Manager Limited