

Foxtons Group plc

Modern Slavery and Human Trafficking Statement

Introduction

Foxtons Group Plc remains committed to ensuring we trade ethically, source responsibly, and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement sets out the steps taken to identify the areas within the business that may be exposed to these risks and how we ensure they are as far as possible eliminated.

This statement, which is for the financial year ending 31 December 2023, is made pursuant to section 54(1) of the Modern Slavery Act 2015 by Foxtons Group plc and on behalf of its operating subsidiaries.

Our Group Structure

Foxtons Group plc (the "Group") is a leading estate and letting agency group. Listed on the London stock exchange, the Group comprises two main operating subsidiaries: Foxtons Limited and Alexander Hall Associates Limited. Foxtons Limited is an estate, letting and property management agency within Greater London; Alexander Hall Associates Limited is a mortgage broker. The Group's headquarters are located in Chiswick, London. The Group employs over 1,000 members of staff. From time to time the Group (or its subsidiaries) may acquire other businesses within the same industry sector.

Supply Chains

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

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

In addition to the above, services the Group procures to assist its customers include property management services and trades, across all relevant sectors.

Our Policies and Code of Conduct

The Group recognises not only the need to comply with its legal and regulatory obligations, but also to do the right thing. The Group's operating activities continued to grow throughout 2023, yet the Board of Directors maintains the view that the overall risk of slavery and trafficking within the Group is low. This assessment is based both on the nature of the business, which is a service-based offering operating almost exclusively within Greater London, UK, within the same industry, as well as the responses to these risks as already implemented.

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.

Through our Environmental, Social and Governance (ESG) policy we aim to create a sustainable organisation, respecting and upholding human rights in the workplace, aiming for fair treatment and mutual respect amongst all employees. By maintaining financial controls, transparency, monitoring

and compliance standards and by combatting bribery, corruption, money laundering and other malpractice, we strive to be a responsible corporate citizen.

We vet parties who want to work with us. We expect them to adhere to our policy and principles. We are committed to ensuring there is no slavery or human trafficking in our organisation or our supply chain. Through our Supplier Code of Conduct we ensure our suppliers, prior to their onboarding, enter into a clear commitment that they will comply with our policy in this area. Early in 2024 we reviewed this Code and found it required no remediation work.

We facilitate an entirely independently operated Whistleblowing helpline. This allows our employees to 'speak up' if they think they have a matter of concern they want to speak about with someone entirely independent from the Group. As a further measure, the helpline allows them to speak totally anonymously.

We observe that the risks of trafficking and slavery may arise within the private rented sector. We train all our staff on our Anti-Money Laundering policy and where appropriate we identify the possible risks of modern slavery and human-trafficking within the private rented sector, for example, illegal immigration or prostitution. Where we identify such wrongdoing we will not hesitate to notify and cooperate with the relevant authorities to ensure that victims are helped, and that perpetrators are brought to justice.

In the event we become aware of a modern slavery or trafficking issue within our supply chain or in our business we will make every effort to remedy the issue. In the event we are unable to do so we will terminate the relationship.

Further steps

During 2023 we did not encounter any slavery or trafficking issues in our supply chain or in our business. We will continue throughout 2024 to review our policies and procedures to further reduce as far as possible the risk of slavery and human trafficking anywhere in our supply chains or within the Group as a whole.

We remain committed to ensuring 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 Foxtons Group plc Board and Foxtons Limited Board on 22 February 2024.

Signed:



Guy Gittins

Chief Executive Officer, Foxtons Group plc,
Director, Foxtons Limited

24 February 2024