

Modern Slavery and Human Trafficking Statement

Bruntwood is publishing this statement under the provision of the UK Modern Slavery Act 2015 (the 'Act'). The Act requires the business to state the actions we have taken during the financial year to ensure modern slavery is not taking place in our operations and supply chains.

Introduction

Modern slavery has no place in our business or supply chains and we take a zero tolerance approach to it. We are strongly committed to playing our part in eradicating modern slavery. This statement refers to the financial year ending September 2023. It sets out the steps Bruntwood has taken, and is proposing to take to address the risk of slavery and human trafficking taking place in its business and within its supply chain.

About Bruntwood

Bruntwood is a leading regional property investment, development and management company driven by an overarching aim of creating thriving cities. This business has an enduring focus on its "3Cs" - its Colleagues, Customers and Communities and deep rooted values. It increasingly operates through partnerships with civic, academic, commercial and third sector organisations. The company owns over 100 properties in the city regions of Manchester, Liverpool, Leeds, Birmingham, Cheshire, Glasgow and Cambridge providing office, retail and laboratory space plus related services. The group offers all sizes of accommodation from virtual, coworking, serviced and managed offices through to more traditional lease arrangements.

Over our 47 year history, the group has developed a proven business model based on an innovative approach to property development combined with a single minded focus on the needs of the customer. Bruntwood develops, lets and manages all its own properties, allowing it to control the whole experience to make sure it meets customers' expectations at every stage. The business in-sources as many functions as it can and in particular those with a customer facing element. This is an important part of the business model and drives greater insight, better delivery and more targeted support for our customers. The delivery of these areas by in-house teams results in a flexible and personal service offer, which in turn results in customer retention rates vastly exceeding the national average.

At the end of the year the group and joint venture employed over 1100 people to provide management services and support to all Bruntwood companies. Nearly 150 of these people have been with the business for more than 10 years.

Our Purpose

At the heart of everything our colleagues do is our core purpose – Creating Thriving

Cities. This purpose is underpinned by our values. Our commitment to help eradicate modern slavery aligns closely with our values. The company has a low risk of slavery or human trafficking among our workforce. Our business is within the UK and accordingly our geographic risk of slavery and human trafficking is considered to be low.

Our Suppliers

We have over 2,300 direct suppliers providing goods and services to the Bruntwood Group. These suppliers range in size from small owner managed businesses to larger regional and national companies.

We are committed to conducting its business in a lawful and ethical manner. In particular, we will not tolerate slavery and/or human trafficking. Bruntwood expects its suppliers, contractors and service providers (“Suppliers”) to also support the elimination of such practices. Our values reflect our commitment to acting ethically and with integrity in all our business relationships and our systems and controls ensure that slavery and human trafficking is not taking place anywhere in our supply chains. We expect all of our Suppliers to comply with our policy.

Bruntwood expects all of its suppliers, contractor and service providers to act ethically, with integrity and to have in place effective systems and controls to combat modern slavery place anywhere in their own business or in any of their supply chains. Before a new supplier, contractor or service provider is approved, appropriate due diligence on the supplier will be carried out. As part of the process, the supplier’s policies will be reviewed or they will be required to adhere to our policy if they do not have their own policy in this area. New suppliers will only be approved once they have completed this due diligence process.

Bruntwood will view any breaches by a supplier of these practises or the supplier’s contractual commitments (if any) very seriously. Breaches may result in Bruntwood requiring an immediate remediation plan. We may also terminate our relationship with any supplier that is in breach or fails to cooperate with remedying a breach. We will continue to monitor the safeguards listed above and consider implementation of further measures if required. We know that the risk of Modern Slavery is dynamic and ever-evolving. For this reason, we intend to regularly review our approach to assessing and mitigating the risk of Modern Slavery.

Reviewed August 2023