

## **Modern Slavery and Human Trafficking Policy Statement**

Landmark Space Limited (“Landmark”) is committed to operating its business ethically and with integrity throughout the organisation. Landmark is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain.

### **THE LANDMARK BUSINESS**

Landmark is a UK based supplier of professional workspace with a 23-year track record of delivering outstanding client care. Our approach is to blend new ways of working with business class experience. We offer inspiring design and stunning communal spaces, alongside smartly presented, professional teams. In summary, our mission is to create professional workspaces that make our clients feel proud.

### **LANDMARK’S POLICIES ON PREVENTION OF MODERN SLAVERY AND HUMAN TRAFFICKING & SUPPLIER DUE DILIGENCE PROCESSES**

As part of Landmark’s remaining commitment to operating ethically and in a manner which complies with relevant laws, Landmark has a large number of policies in place which assist in delivering performance and strong business management. In addition to this policy, those that also act to prevent acts of modern slavery and human trafficking include its policies on Anti Bribery, Complaints, Diversity, Equal Opportunities, Grievance, Personal Harassment, Recruitment, Right to Work, Whistleblowing and Work experience.

Landmark’s Supplier Code of Conduct requires suppliers to ensure that workers are not treated in a harsh or inhumane way or in any way that is contrary to UK law relating to modern slavery and human trafficking. Landmark also takes steps to ensure that its suppliers are aware of our policies and we expect them to adhere to Landmark’s high standards.

Geographically, Landmark’s supply chains are predominantly based in the UK, although some of its suppliers do operate internationally. Where suppliers operate within industries and/or countries with a higher risk of slavery and human trafficking, such as construction, domestic service and food supplies, these are subject to further due diligence and monitoring procedures by Landmark.

Landmark supports, adheres to and respects the protection of internationally proclaimed human rights contained in applicable law, regulation, regulatory policies, guidelines and industry codes and standards. This includes but is not limited to the United Kingdom Modern Slavery Act 2015.

Minimum requirements followed by Landmark, and for which its suppliers are similarly required to abide, are as follows:

1. In respect of working hours, holidays/rest days are provided in accordance with their employment contracts and if after prior agreement from their line manager, if paid overtime is due, that it is properly documented and paid;
2. In respect to salaries payable to Colleagues, this is paid in accordance with their employment contracts and meets or exceeds minimum good practice in local jurisdictions that is sufficient to meet basic human needs.

3. Permitting Colleagues to freely associate with others, form, and join organisations of their choice, to the extent that this does not disrupt their daily work commitments to Landmark.
4. Preventing discrimination at work and not carrying out, tolerating or promoting discrimination in recruitment or during their employment. Discrimination includes discrimination based on race, ethnicity, religion, age, sex, marital status or sexual orientation.
5. Not using any form of forced or compulsory labour or depriving a Colleague's liberty for the purposes of personal or commercial gain.
6. Not using child labour and not employing or engaging any person if they are below the legal working age in the relevant jurisdiction in which those employees or persons are domiciled.
7. Not engaging any child in any form of work that could be harmful to his/her health, moral or social development, even if the applicable legal working age is below 18 years of age.
8. Not engaging in, supporting or promoting human trafficking or any form of slavery. The meaning of slavery and human trafficking shall include but is not limited to:
  - (i) The offences of slavery, servitude and forced or compulsory labour and human trafficking as defined in sections 1, 2 or 4 of the Modern Slavery Act 2015;
  - (ii) The offences of slavery, servitude and forced or compulsory labour and human trafficking as defined in sections 1, 2 or 4 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015;
  - (iii) The offences of slavery, servitude and forced or compulsory labour as defined under section 47 of the Criminal Justice and Licensing (Scotland) Act 2010.
  - (iv) The trafficking for exploitation as defined under section 4 of the Asylum and Immigration (Treatment of Claimants, etc.) Act 2004;
  - (v) The traffic in prostitution offence as defined under section 22 of the Criminal Justice (Scotland) Act 2003;

## **EFFECTIVENESS OF MEASURES TAKEN**

In recent years, Landmark has reduced the number of suppliers it works with and increased its involvement with the remaining suppliers, which also assists in ensuring that appropriate steps are taken to prevent acts of modern slavery and human trafficking.

Landmark's largest operational costs are rent, rates, service charges and insurance on its properties, all of which are in the United Kingdom. The landlords of all the Company's properties are respectable Institutions and companies based in the United Kingdom, and in the majority of cases their properties are managed by well-known UK based Property Agents. By close interaction with these parties, Landmark considers that the opportunity for acts of modern slavery and human trafficking are minimal and it is not aware of any such instances having occurred in its supply chain.

Landmark has had no instances of Modern Slavery or Human Trafficking in its business or that of its suppliers in recent years.

During the financial year ending 2004, Landmark has not made any new changes to our approach in addressing modern slavery and human trafficking. We continue to maintain the policies, due diligence processes, and risk assessments set out in our previous statement.

## **STAFF TRAINING**

Landmark actively engages with Colleagues on many important matters, including policies that relate to modern slavery and human trafficking. The Landmark intranet provides a fast and secure communications platform allowing increased awareness, identification and reporting of any potential breaches of Company policies. Landmark also provides e-learning to its Colleagues, and in particular to new Colleagues on a wide variety of subjects including modern slavery and human trafficking.

## **REPORTING**

Should you suspect there has been a breach of this policy, this can be notified in the following ways:

**By post:** in confidence to Tuba Gumusler, HR Director, Landmark Space Limited, 1 Royal Exchange, London, EC3V 3DG or Jonathan Eccles, Finance Director, Landmark Space Limited, 1 Royal Exchange, London, EC3V 3DG.

Anyone who suspects there may have been a breach of this policy is encouraged to put their concerns in writing and to disclose their identity to Landmark, all of which will be handled in strict confidence. This will avoid delays in enabling a thorough investigation to promote a prompt conclusion to the matter raised.

## **LEGAL COMPLIANCE**

This statement is given in accordance with the provisions of Section 54(1) of the Modern Slavery Act 2015.

Ed Cowell

Chief Executive Office Landmark Limited

May 2025