

Modern Slavery Act 2015

Europe Legal and Compliance

Approver's name and title:

Mark Packer
Director

Effective date:

November 2016

Review date:

December 2019

Next review date:

December 2020

Purpose

Lendlease Europe Holdings Limited and its subsidiaries¹ ('**Lendlease**') has taken and continues to take steps to improve our practices to combat slavery and human trafficking both within our own business and that of our supply chains. The aim for Lendlease is to inform and encourage our staff and those within our supply chain to be more vigilant to the issues around slavery and human trafficking and to provide them with an opportunity to raise any concerns.

Policy

Organisation's Structure

Lendlease is a multi-discipline company providing Consultancy, Asset & Property Management, Infrastructure, Development, Investment Management and Construction Services within the Construction and Real Estate industry. We have circa 1300 employees across the business and have a multi-disciplined supply chain to support us through the different aspects and provisions of our business. We are part of the Lendlease Group and our ultimate parent company is Lendlease Corporation Limited which has its head office in Sydney, Australia.

Our Policies

We operate a number of internal policies to ensure that we are acting ethically and with integrity in all our business relationships and implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

¹ Please see Appendix



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We are committed to building a workplace in which all individuals are supported, respected and connected and this forms part of our Diversity and Inclusion policy which can be found on our company website [here](#).

Lendlease is also a signatory to the United Nations Global Compact (UNGC) and as part of our commitment to the UNGC we produce an annual “Communication on Progress” against the UNGC 10 universal principles and broader UN development goals which can be found [here](#).

Due Diligence Processes

As part of our initiative to identify and mitigate risk, we have in place or will be putting in place systems to (but not limited to):

1. Accredit our supply chain using the Achilles Building Confidence audited accreditation scheme. This has included for several years, audited pre-qualification checks on ethical procurement, child and forced labour, anti-bribery and corruption, sustainable products, living wage and working hours. The scheme includes a section on Modern Slavery and our supply chains adherence to the Act. We continue to review and update this section of accreditation process to ensure we continue to improve and aim for best practice;
2. Monitor other potential risk areas such as;
 - Materials sourced from overseas, in particular, regions with elevated risk of modern slavery practices;
 - Sub-sub supply chain; and
 - Use of temporary labour agencies;
3. In addition to the existing Achilles Building Confidence accreditation, we will be carrying a ‘Labour Practice Audit’ on our top 50 subcontractors every year from 2020 onwards. This will allow us to drill much further into our supply chain’s labour processes. To compliment this, we will also carry out a labour Practice “Worker Interview” audit with randomly selected operatives working on our sites (five or more projects per annum). The aim of the audit is to gauge the understanding of Modern Slavery and Labour practices at the operative level and highlight any risks to follow up with the supplier audits.
4. Lendlease has launched in the UK it’s Living Wage Policy and has committed that all its staff and those of our supply chain working on Lendlease sites and offices in the UK will be paid a minimum of the Living Wage as defined by the Living Wage Foundation.
5. In collaboration with other industry partners, Lendlease is part of the Supply Chain Sustainability School ([website](#)). We use the schools’ resources to share knowledge and best practices internally, our supply chain and to operatives working across our project sites; and



6. Encourage the reporting of concerns and the protection of whistle blowers (Whistleblowing Policy)

Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. In addition to the accreditation checks, to ensure all those in our supply chain and contractors comply with our values we have in place requirements to comply with Lendlease Core Values and Global Minimum Requirements which can be viewed on our company website [here](#).

A Lendlease global “Supplier Code of Conduct” will be published in early 2020. The Supplier Code of Conduct will become part of our contracts with the supply chain, setting out the standards and expectations we require our suppliers to adhere to. These requirements include, amongst others, Modern Slavery, pay and worker rights. The Supplier Code of Conduct will allow suppliers to be able to lodge confidential reports in instances where they become aware of actions that contravene or appear to contravene that Code.

New global Modern Slavery Guide and Modern Slavery e-learning tools are also being released in early 2020, to build awareness for our employees.

Our Effectiveness in Combating Slavery and Human Trafficking

We will continue to improve and develop our current existing processes to tackle slavery and human trafficking and this includes (but not limited to):

1. Continually auditing and reviewing our current business practices with regards to recruitment and treatment of employees;
2. Reviewing and improving our learning and development courses to include Modern Slavery training to provide:
 - General awareness training to all Lendlease employees;
 - Site management training for all site employees; and
 - Supply chain training via. the Sustainability Supply Chain School;
3. Working through our BeOnsite organisation, Lendlease is involved with the Chartered Institute of Building (“CIOB”) on their Bright Futures project on modern slavery which aims to provide paid employment placements to victims of modern slavery. We are working with the CIOB to further develop and grow this initiative; and



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4. Requiring our supply chain members to update their information on a regular basis and Lendlease annually auditing the supply chain members on their updated information at their premises.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. The statement has been approved by the Board of Directors who will review and update it as necessary on an annual basis.

Lendlease Europe Holdings Limited

A handwritten signature in black ink, appearing to read "Mark Packer".

Mark Packer

Director

Date: 17th December 2019



Appendix

This statement applies to the following Lendlease Europe Holdings Limited subsidiaries:

- Lendlease Construction (Europe) Limited
- Lendlease Development (Europe) Limited
- Lendlease (Elephant & Castle) Limited
- Lendlease Residential (CG) Limited