



## **ANTI-SLAVERY, HUMAN TRAFFICKING AND CHILD LABOUR POLICY STATEMENT**

### **Introduction**

This is the first statement to be made by McKay Securities Plc (“McKay”) pursuant to section 54 of the UK Modern Slavery Act 2015 (the “Act”). Under the Act the Company is not required to produce a statement as its global turnover is less than £36 million but we at McKay are committed to implementing best practice to combat all forms of human trafficking, forced labour and unlawful child labour (collectively ‘human trafficking and slavery’) in any activities carried out by the Company or its subsidiary, Baldwin House Limited, and throughout our supply chain.

### **Our business**

McKay is a commercial property investment company with Real Estate Investment Trust (“REIT”) status, listed on the main market of the London Stock Exchange. It operates solely in the UK and specialises in the development and refurbishment of quality office, industrial and logistics buildings within established and proven markets of London and South East England. We have a team of 19 directly employed by McKay that are based at our head office, and our property portfolio was valued at £482.70 million as at 31<sup>st</sup> March 2019.

### **Our supply chain**

Our supply chain is wide ranging and includes direct suppliers such as consultants, advisors, contractors, suppliers of good and services and professional services, as well as indirect suppliers or subcontractors through our primary contractors.

### **Our policy on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This reflects our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains. We aim to ensure transparency within our organisation and those of our suppliers.

We will not knowingly use unlawful child labour or forced labour in any of the services we provide, nor will we knowingly accept products or services from suppliers that employ or utilise child labour or forced labour.

### **Our approach**

Our employees adhere to high standards of behaviour and integrity in relation to the Modern Slavery Act 2015 as part of our concerted effort to prevent slavery and human trafficking. We believe we all have a responsibility for promoting ethical and lawful employment practices throughout our business. All our employees are paid in excess of the National Living Wage and based on the small team directly employed by McKay we believe the risk of any slavery or human trafficking in respect of our employees is low.

In addition to our policy on slavery and human trafficking, we have in place the following policies that underpin our ethical values and behaviours. These policies are part of our new employee induction process, available to all staff on our intranet and can be found on our website [mckaysecurities.plc.uk](http://mckaysecurities.plc.uk):

- Anti-Corruption and Bribery Policy
- Equality and Diversity Policy
- Health and Safety Management Policy
- Responsible Procurement Policy
- Stakeholder Engagement Policy
- Whistleblowing policy

If any employee has any suspicions or concerns on slavery or human trafficking in any part of the business or supply chain they are encouraged to raise this through the Company Secretary.



## Due diligence processes for slavery and human trafficking

The day to day property management of the majority of our buildings and project management of development and refurbishment is undertaken internally by the Company.

As part of our initiative to identify and mitigate risk we have the following three step system in place to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers

Step:

- 1) All prospective suppliers are required to complete a PQQ (pre-qualification questionnaire prior to engagement and at this stage any areas of risk are identified.
- 2) All suppliers are required sign up to the Company's Responsible Procurement Policy.
- 3) A full audit of key suppliers is undertaken on a regular basis by our third-party sustainability partners.

## Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we require our suppliers and contractors hiring policies are in line with the Modern Slavery Act requirements and our National Living Wage requirements and that they respect and follow this policy to ensure slavery and human trafficking is not present in any of our supply chains.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide targeted awareness training to our Asset Managers, Project Managers and Occupier Services team.

## Further steps

We recognise the importance of maintaining a constant vigilance in order to identify and address any issues associated with slavery and human trafficking within our supply chains. We are committed to continually strengthening our practices to identify, assess, mitigate and prevent any actual or potential risks in these areas and will look at establishing key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

## Policy Management

**Publication** – This policy shall be available through the Company Secretary and on the 'P' drive.

**Effective Date** – This policy is effective from 6th February 2020.

**Revisions** – The Company Secretary is responsible for the maintenance and accuracy of this policy. This policy will be reviewed annually.

Approved by the Board and signed by:

A handwritten signature in black ink, appearing to read 'S. Perkins'.

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S. Perkins  
Chief Executive Officer