

Modern Slavery Statement

Author	Antonia van Maris, Rowan Packer
Signed by Modern Slavery Officer	Head of Sustainability: Rowan Packer e: rowan.packer@wearemapp.com t: 07966 347 247
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Louise Bonham
CEO
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Background

MAPP is a property manager of commercial and mixed-use property, managing £30 billion of commercial property and 6,965 occupiers throughout the United Kingdom for a variety of funds, real estate investment trusts (REITs), Investment Managers and a growing international client base in real estate. In addition to our head office in London, we have offices in Bristol, Manchester, Glasgow and Birmingham. We employ over 600 people, with over half based out of our offices, and the remainder based on sites we manage on behalf of our clients. As we surpassed the £36 million threshold in turnover in the 2022/2023 financial year, we are now required to publish an annual statement under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.

1. Organisation structure and supply chains

- 1.1.** MAPP (Property Management) Ltd is the primary trading entity of the MAPP brand, which is owned and operated by an Employee Owned Trust (EOT) as of the 7th November 2023. MAPP has three subsidiaries all based in the UK; Flex (RE-Defined), Building Consultancy and Energy by MAPP.
- 1.2.** Annual modern slavery policy and statement reviews are managed and signed off by the Head of Sustainability, currently Rowan Packer, who reports to the CEO, Louise Bonham. Management of modern slavery risk is shared across the sustainability, procurement and compliance teams, and any programmes and plans put in place to address risk need to be signed off by the Senior Executive Board (SEB).
- 1.3.** As a provider of property management services, MAPP (Property Management) Ltd procures and manages a large and varied supplier base to work on our managed sites and properties on behalf of our clients. This includes for example procuring cleaning, security and M&E contracts. The services we instruct on our managed properties make up the bulk of our supply chain, with only a small percentage instructed directly for MAPP's own activities, for example our cleaners in our offices.
- 1.4.** MAPP (Property Management) Ltd's supply chain is made up of three key areas; fully approved, client requested and payment only. The majority of suppliers are fully approved and are vetted using a prequalification questionnaire which is reviewed by Procurement, Sustainability and HSE. In the scenario where suppliers are directly client requested, the client accepts liability for the supplier and MAPP will act as a payment function. MAPP also doesn't accept liability for payment only suppliers, which are generally used for low value, one off items
- 1.5.** To ensure prompt payment and good planning our CAFM system streamlines and controls our invoice approval matrix and import deadline. Payment runs are processed on a weekly basis.



1.6. MAPP's subsidiaries Flex (RE-Defined), Building Consultancy and Energy by MAPP operate their own supplier management processes. Over the coming 12 to 24 months, these will be reviewed to ensure modern slavery risk management is integrated into supplier onboarding and ongoing management.

2. Policies in relation to slavery and human trafficking

2.1. MAPP operates several policies which include provisions and safeguards in relation to modern slavery. Policies are all assigned a lead author, usually at director level, and each policy is reviewed annually and signed off.

2.2. New employees are required to confirm their receipt, understanding and agreement to work within the requirements of these policies as part of their onboarding process. These policies are available at all times to employees on our company google drive and are further clearly signposted on our internal communication platform.

Policy	Provision	Available to
Modern Slavery and Human Trafficking Policy	<ul style="list-style-type: none"> ● sets out our employee expectations ● sets out supplier vetting and expectations. ● sets out reporting mechanisms. 	Employees
Equal Opportunities and Diversity Policy	<ul style="list-style-type: none"> ● prohibits discrimination and any threat of violence, harassment and intimidation. ● prohibits discrimination on grounds of trade union membership protecting the right to freedom of association. 	Employees
Procurement Policy Supplier Pre-Qualification Questionnaire Supplier Agreement Terms & Conditions	<ul style="list-style-type: none"> ● states supplier requirements: <ul style="list-style-type: none"> ○ zero involvement in modern slavery. ○ purchasing goods and services that are produced and delivered in line with the principles of the International Labour Organisation (ILO), in respect to human rights and conditions of employment. ○ operation of an anti-slavery policy and annual statement where applicable. 	Employees Suppliers
Whistleblowing Policy	<ul style="list-style-type: none"> ● sets out the mechanism and procedure by which employees can report matters of concern including modern slavery. ● all disclosures may be made anonymously. 	Employees
Code of Ethical Conduct	<ul style="list-style-type: none"> ● reiterates our commitments towards prohibiting discrimination, harassment and modern slavery and holding our suppliers to the same standards. 	Employees
Flexible Working Guidelines	<ul style="list-style-type: none"> ● outlines how employees can request flexible working and how MAPP makes adjustments to accommodate individual working preferences. ● clearly demonstrates employees are not bound to a workplace and 	Employees



	have freedom of movement.	
End of Employment Policy	<ul style="list-style-type: none"> • sets out the rights and responsibilities of MAPP and employees around the ending of employment at MAPP. • clearly demonstrates workers have the freedom to terminate employment. 	Employees

2.3. Our Modern Slavery and Human Trafficking Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, and external consultants. We expect the same high standards from all of our contractors, suppliers and other business partners, and expect all stakeholders to extend these policy requirements onto any 3rd party supply chains.

3. Risk assessments and due diligence processes

3.1. Our standard recruitment processes safeguard against instances of modern slavery within our own employee base. We carry out basic DBS checks to identify if any applicants have been convicted of any offences under the Modern Slavery Act, do not retain worker documentation, ensure that workers are not charged recruitment fees and carry out identification checks.

3.2. MAPP (Property Management) Ltd conducts due diligence on all suppliers before allowing them to become a preferred supplier and carry out checks to identify whether suppliers have been convicted of any offences under the Modern Slavery Act. As part of our supplier onboarding process, we seek assurances that they are compliant with the Modern Slavery Act and ETI Base Code, and ask them to declare their modern slavery policy. Our stakeholders are also obliged to notify us within five days if a suspected or actual incident of modern slavery is identified in their own operation or supply chain.

3.3. MAPP has yet to complete a specific modern slavery risk assessment, establish a register and implement ongoing due diligence programmes. The below outlines the steps we are planning to take in the coming 12 to 24 months:

- Integrate a modern slavery risk assessment into our new supplier onboarding process by for example using the global slavery index.
- Explore how we are going to map modern slavery risk across our existing supply chain and how we are going to address them.
- Audit a selection of our suppliers on social and environmental credentials, including modern slavery, through engagement meetings and site visits.
- Implement human rights due diligence, to assess actual and potential human rights impacts our activities may cause or contribute to.
- Finalise our drafted incident response plan, so we have processes in place if modern slavery is discovered within our business or supply chain.

4. Key performance indicators and effectiveness

- 4.1. To date, we have not had any grievances, complaints or suspected incidents of modern slavery reported to us, in relation to our business or our supply chain.
- 4.2. Our company-level grievance mechanism is to report modern slavery concerns either to the Modern Slavery Officer (as per the contact details listed in our Modern Slavery and Human Trafficking Policy) or the Dedicated Whistleblowing Officer (as per the contact details listed in our Whistleblowing Policy). We currently do not have a process in place to provide remedy and compensation for labour rights abuses within our company and supply chain, and are reviewing how we would set this up.
- 4.3. MAPP (Property Management) Ltd carry out quarterly reviews of our key cleaning, security, MEP, landscaping, front of house and lift & escalator suppliers against an agreed set of Key Performance Indicators (KPI's), which are discussed and agreed with each contractor prior to contract commencement and included in their Service Level Agreements (SLA's). These include KPIs to improve environmental performance and deliver positive social outcomes.
- 4.4. We have an action tracker in place covering the points set out in 3.3 to improve our modern slavery risk management. This is jointly managed by MAPP's Compliance, Procurement and Sustainability teams. Following the completion of the actions listed in 3.3, we will have the information to hand to make informed choices about the Modern Slavery KPIs we should put into place.

5. Training on modern slavery and trafficking

- 5.1. We have a designated training platform that all our employees have access to and are expected to make use of. During onboarding of any new employees, there are multiple training modules they have to complete, one being a Modern Slavery Course. This course covers what modern slavery is, the different types of slavery, how to spot the signs, MAPP's Modern Slavery Policy and a quiz with a pass mark to check understanding.
- 5.2. All employees are required to undergo a mandatory annual refresher training of this course.



6. Accountability

Roles	Responsibilities
<p>Appointed Modern Slavery Officer (MSO), Executive Director - Head of Sustainability and Social Value in Sustainability</p>	<ul style="list-style-type: none"> ● Reviewing and signing off on modern slavery policies and statements ● Overseeing sustainability vetting of suppliers during the onboarding process, including modern slavery provisions ● Dedicated point of contact for people to raise grievances relating to modern slavery ● Reporting and acting on any modern slavery claims and forming an incident response plan ● Driving improvements in Modern Slavery risk management
<p>Dedicated Whistleblowing Officer (DWO), Executive Director - Head of People and Talent in People</p>	<ul style="list-style-type: none"> ● Dedicated point of contact for people to raise grievances relating to modern slavery ● Reporting and acting on any modern slavery claims ● Liaising with the MSO on modern slavery concerns
<p>Executive Director - Head of People and Talent in People</p>	<ul style="list-style-type: none"> ● Ensuring all new employees have read and confirm understanding of the MAPP Modern Slavery Policy ● Managing and implementing modern slavery training across the MAPP employee base and tracking compliance ● Ensuring our standard recruitment processes safeguard against instances of modern slavery within our own employee bases
<p>Legal Counsel in Legal</p>	<ul style="list-style-type: none"> ● Ensuring modern slavery requirements are set out where required in our Property Management Agreements.
<p>Senior Executive Director - Head of Facilities Management in SEB</p>	<ul style="list-style-type: none"> ● Managing corporate and operational modern slavery risks ● Driving modern slavery risk management improvement program ● Ensuring modern slavery safeguards are built into all our applicable processes ● Updating the Procurement Policy to reflect the modern slavery improvement program requirements ● Line manager to <i>Head of FM Building Standards & Reporting in Compliance</i> and <i>Associate Director - Procurement in Procurement</i>
<p>Head of FM Building Standards & Reporting - Facilities Management</p>	<ul style="list-style-type: none"> ● Establishing an audit programme across the FM operations to report on approved supply chain ● Ensuring modern slavery safeguards are built into all our applicable processes within the FM structure. ● Reporting on Riskwise KPI's back to <i>Senior Executive Director - Head of Facilities Management in SEB</i>
<p>Associate Director - Procurement in Procurement</p>	<ul style="list-style-type: none"> ● Managing and implementing the approved supplier onboarding process ● Ensuring MAPP fully approved supplier contracts include modern slavery provisions ● Informing contractor Riskwise KPI's ● Reporting on Riskwise KPI's back to <i>Head of FM Building Standards & Reporting in Compliance</i>