

# Modern Slavery and Human Trafficking Policy & Modern Slavery Statement V.02

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<b>0.2</b>	15 <sup>th</sup> September 2026	Updated to reflect the change in Modern Slavery Officer from the 'Executive Director - Head of Sustainability and Energy, Rowan Packer' to 'Senior Executive Director - Head of FM Consultancy and FM Strategy, Mike Lewis'



0.1	1st February 2025	Merged standalone Modern Slavery Policy and statement into one document. Updated wording in line with the new SMT structure and roles & responsibilities.
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Modern Slavery and Human Trafficking Policy

## Background

MAPP recognises that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This policy ensures MAPP's alignment to the Modern Slavery Act 2015, and is reviewed annually by the Sustainability, FM division and Head of Risk and Assurance.

In 2022 this policy was reviewed by the Modern Slavery consultant RightsDD, who supports companies to tackle modern slavery risk and due diligence in operations and supply chains. The review was conducted with reference to and in alignment with the following standards:

- The United Nations Guiding Principles on Business & Human Rights ('UNGPs')
- Section 54 of the UK Modern Slavery Act 2015 ('MSA').
- The UK Government's 'Transparency in Supply Chains etc. A Practical Guide' ('HMG Guide')
- The Ethical Trading Initiative's Base Code ('ETI Base Code').

## 1. Policy statement

- 1.1 We are committed to acting ethically and with integrity in all our business dealings and relationships and ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 1.2 We are committed to implementing and enforcing both proactive and passive effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 This 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.
- 1.4 We expect the same high standards from all our contractors, suppliers and other business partners, and expect all stakeholders to extend these policy requirements onto any 3rd party supply chains.
- 1.5 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## 2. Implementation

- 2.1 As part of our standard recruitment process, we carry out basic DBS checks to identify if any applicants have been convicted of any offences under the Modern Slavery Act.

- 2.2 MAPP operates a supplier policy and maintains a preferred supplier list. We conduct 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.
- 2.3 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.
- 2.4 All suppliers are further notified of this policy and required to confirm their receipt, understanding and agreement to work within its requirements.
- 2.5 To mitigate risks against our policy, we conduct regular due diligence on our existing supply chain based on the requirement listed/ summarised below and further reflected in our procurement policy.
- Management (Performance, Financial & Quality Assurance)
  - Health, Safety, Fire & Environmental Risk Management
  - Service Specific Compliance (e.g. relating to Security, Cleaning, M&E, Lifts, etc.)
  - Sustainability and social value (improvement of environmental performance and delivery of positive social impact outcomes).
- 2.6 In addition, regular reviews are undertaken of our supplier base through FM inspections and HSE risk assessments at MAPP managed sites.
- 2.7 From 2024, successful tenders include a requirement that gives the MAPP Procurement team the right to audit the supplier to ensure compliance against our procurement policy, including modern slavery. This will be a risk-based sample approach.

### 3. Compliance

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control and on our behalf. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 If you are one of our stakeholders, such as a contractor, supplier or other business partner, you are obliged to notify us within five days if a suspected or actual incident of modern slavery is identified in your own operation or your supply chain.
- 3.4 Whether you are a MAPP employee or work for one of our suppliers, you are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you are encouraged to raise concerns.

- 3.6 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Modern Slavery Officer (MSO) who is currently the Senior Executive Director - Head of FM Consultancy and FM Strategy. The MSO can be contacted on [Mike.Lewis@wearemapp.com](mailto:Mike.Lewis@wearemapp.com) or 07976 243 045. In the absence of the MSO, a member of the Senior Management Team may nominate another officer to carry out the MSO's duties under this policy. Alternatively, you can report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the CEO immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## 4. Breaches

- 4.1 All possible transgressions of this policy will be investigated with reference to our relevant policies, agreements for the supply for services, confidentiality agreements and HR policies.
- 4.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.3 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 5. Communication and awareness

- 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. All employees are required to undergo a mandatory annual refresher training of this course.
- 5.2 Our approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 5.3 All incumbent suppliers, contractors and business partners shall be notified of our Modern Slavery Statement and required to confirm their receipt, understanding and agreement to work within its requirements.

## Modern Slavery Statement

MAPP is a property manager of commercial and mixed-use property, managing over £30 billion of commercial property and looking after 9,500+ units throughout the United Kingdom for a variety of leading funds, real estate investment trusts and other investors in real estate. In addition to our head office in London, we have offices in Bristol, Manchester, Glasgow and Birmingham. We employ over 650 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 by an Employee Ownership 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 Senior Executive Director - Head of FM Consultancy and FM Strategy, currently Mike Lewis, who reports to the CEO, currently Louise Bonham. Management of modern slavery risk is shared across the compliance, procurement and sustainability teams, and any programmes and plans put in place to address risk need to be signed off by the Senior Management Team (SMT).
- 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 the relevant departments, such as Procurement, Sustainability and H&S. In the scenario where suppliers are directly client requested, the client accepts liability for the supplier and MAPP will act as a payment function only. MAPP doesn't accept liability for payment only suppliers, which are generally used for low value, one off items.
- 1.5 MAPP's subsidiaries/LLP's Flex (RE-Defined), Building Consultancy and Energy by MAPP operate their own supply chain. Their supplier onboarding and management processes are already in alignment with MAPP Ltd's procurement processes where possible including modern slavery risk management, as set out in clause 1.5. Any suppliers that have not been vetted according to MAPP Ltd's standard process will be reviewed over the coming 12 to 24 months to bring them into alignment where applicable.

## 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 & Statement	<ul style="list-style-type: none"> <li>sets out:               <ul style="list-style-type: none"> <li>our employee expectations</li> <li>supplier vetting and expectations</li> <li>reporting mechanisms</li> <li>risk assessments and due diligence processes</li> <li>key performance indicators and effectiveness</li> <li>communication and awareness</li> <li>accountability</li> </ul> </li> </ul>	Employees Suppliers
Equal Opportunities and Diversity Policy	<ul style="list-style-type: none"> <li>prohibits discrimination and any threat of violence, harassment and intimidation.</li> <li>prohibits discrimination on grounds of trade union membership protecting the right to freedom of association.</li> </ul>	Employees
Procurement Policy  Supplier Pre-Qualification Questionnaire  MAPP Supplier Terms & Conditions	<ul style="list-style-type: none"> <li>states supplier requirements:               <ul style="list-style-type: none"> <li>zero involvement in modern slavery.</li> <li>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.</li> <li>operation of an anti-slavery policy and annual statement where applicable.</li> </ul> </li> </ul>	Employees Suppliers
Whistleblowing Policy	<ul style="list-style-type: none"> <li>sets out the mechanism and procedure by which employees can report matters of concern including modern slavery.</li> <li>all disclosures may be made anonymously.</li> </ul>	Employees
Code of Ethical Conduct	<ul style="list-style-type: none"> <li>reiterates our commitments towards prohibiting discrimination, harassment and modern slavery and holding our suppliers to the same standards.</li> </ul>	Employees
Flexible Working Guidelines	<ul style="list-style-type: none"> <li>outlines how employees can request flexible working and how MAPP makes adjustments to accommodate individual working preferences.</li> <li>clearly demonstrates employees are not bound to a workplace and have freedom of movement.</li> </ul>	Employees
End of Employment Policy	<ul style="list-style-type: none"> <li>sets out the rights and responsibilities of MAPP and employees around the ending of employment at MAPP.</li> <li>clearly demonstrates workers have the freedom to terminate employment.</li> </ul>	Employees

### 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, ask them to declare their modern slavery policy and ask them to confirm their receipt, understanding and agreement to work within the requirements of this policy and statement. 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. From 2024, all successful tenders include a requirement that gives the MAPP Procurement team the right to audit the supplier to ensure compliance against our procurement policy, including modern slavery.
- 3.3 We ensure suppliers are paid for their work promptly through our Computer Aided Facility Management (CAFM) system, which streamlines and controls our invoice approval matrix and import deadline. This ensures proper payment planning and payment runs are processed on a weekly basis.
- 3.4 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 referenced in the policy above) 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 3.4 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 3.4, we will have the information to hand to make informed choices about the Modern Slavery KPIs we should put into place.

## 5. Accountability

Company	Roles	Responsibilities
MAPP (Property Management) LTD	CEO	<ul style="list-style-type: none"> <li>Establish a modern slavery framework</li> <li>Delegate authority for execution to the dedicated Modern Slavery Officer (MSO)</li> <li>Ensure the strategic objectives of the organisation reflect all applicable matters concerning modern slavery</li> <li>Providing adequate resources to implement the framework</li> </ul>
	Appointed Modern Slavery Officer (MSO)	<ul style="list-style-type: none"> <li>Reviewing and signing off on modern slavery policies and statements</li> <li>Dedicated point of contact for people to raise grievances relating to modern slavery</li> <li>Reporting and acting on any modern slavery claims and forming an incident response plan</li> <li>Driving improvements in Modern Slavery risk management</li> <li>Answering queries on our Modern Slavery Policy, Statement and processes and procedures</li> </ul>
	Dedicated Whistleblowing Officer (DWO)	<ul style="list-style-type: none"> <li>Dedicated point of contact for people to raise grievances relating to modern slavery</li> <li>Reporting and acting on any modern slavery claims</li> <li>Liaising with the MSO on modern slavery concerns</li> </ul>
	Executive Director - Head of People and Talent in People	<ul style="list-style-type: none"> <li>Ensuring all new employees have read and confirm understanding of the MAPP Modern Slavery Policy</li> <li>Managing and implementing modern slavery training across the MAPP employee base and tracking compliance</li> <li>Ensuring our standard recruitment processes safeguard against instances of modern slavery within our own employee bases</li> </ul>

	Legal Counsel in Legal	<ul style="list-style-type: none"> <li>Ensuring modern slavery requirements are set out where required in our Property Management Agreements</li> </ul>
	Senior Executive Director - Head of FM Consultancy and FM Strategy	<ul style="list-style-type: none"> <li>Managing corporate and operational modern slavery risks, and driving management improvement programs</li> <li>Ensuring modern slavery safeguards are built into all our applicable processes within the FM structure</li> <li>Answering queries on our Modern Slavery Policy, Statement and processes and procedures</li> <li>Driving improvements in Modern Slavery risk management in procurement and supply chain management processes</li> <li>Ensuring MAPP Supplier Terms &amp; Conditions include modern slavery provisions</li> <li>Updating the Procurement Policy to reflect the modern slavery improvement program requirements</li> <li>Establishing an audit programme across the FM operations to report on approved supply chain</li> </ul>
	Executive Director - Head of Facilities Management	<ul style="list-style-type: none"> <li>Managing and implementing the approved supplier onboarding process, including modern slavery provisions</li> <li>Informing supplier Riskwise KPI's</li> </ul>
	Executive Director - Head of Risk & Assurance	<ul style="list-style-type: none"> <li>Monitoring corporate modern slavery risks and driving management improvement programs as part of the company risk framework and IMS</li> </ul>
	Senior Management Team (SMT)	<ul style="list-style-type: none"> <li>Ensuring this policy complies with our legal and ethical obligations, and that all those under our management comply with it</li> <li>Escalating any emerging risks to the MSO and Head of Risk &amp; Assurance</li> </ul>
Energy by MAPP LLP	Executive Director - Head of Energy by MAPP	<ul style="list-style-type: none"> <li>Managing corporate and operational modern slavery risks, and driving management improvement programs including in supply chain management processes</li> </ul>
MAPP (Building Consultancy) LLP	Senior Executive Director - Head of Building Consultancy	<ul style="list-style-type: none"> <li>Managing corporate and operational modern slavery risks, and driving management improvement programs including in supply chain management processes</li> </ul>
Flex by MAPP LLP/ MAPP Re-Defined LLP	Head of Business Development and RE-DEFINED Partner	<ul style="list-style-type: none"> <li>Managing corporate and operational modern slavery risks, and driving management improvement programs including in supply chain management processes</li> </ul>
MAPP Ltd and its subsidiaries	Line managers	<ul style="list-style-type: none"> <li>Ensuring those reporting to them understand and comply with this policy and are given adequate and regular training</li> </ul>

	All MAPP employees	<ul style="list-style-type: none"> <li>• Read, understand and comply with this policy and statement</li> <li>• Prevent, detect and report modern slavery or suspicion of modern slavery in any part of our business or supply chains</li> </ul>
	All MAPP stakeholders	<ul style="list-style-type: none"> <li>• Read, understand and comply with the MAPP Modern Slavery Policy</li> <li>• Prevent, detect and report modern slavery or suspicion of modern slavery in any part of our business or supply chains</li> <li>• Notify us within five days if a suspected or actual incident of modern slavery is identified in your own operation or your supply chain</li> </ul>