



## **MODERN SLAVERY ACT STATEMENT**

**31 December 2024**

This statement is made by APML Estate Limited ("APML") pursuant to section 54 of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement for the financial year ending 31 December 2024.

### **Introduction**

APML acknowledges, supports and upholds the provisions of the Modern Slavery Act 2015.

We are absolutely committed to ensuring that acts of modern slavery, human trafficking, and child and sexual exploitation do not occur within our business or supply chain.

### **About Us**

APML provides property and asset management services in respect of a retail, office, industrial, leisure and residential portfolio located within the United Kingdom. The immediate team of 19 has direct relationships with external businesses which provide support in the context of daily needs as well as in relation to development projects.

### **Our Internal Policies**

We are committed to maintaining the highest levels of transparency and welfare within our business. We support and respect the protection of human rights and have a strict no tolerance approach to slavery and human exploitation in all their forms.

Our business culture promotes the following values:

- high ethical standards of operation and colleague welfare;
- equal treatment of colleagues to prevent discrimination;
- the ability to work in an environment free of physical, psychological or verbal abuse, the threat of abuse and sexual or other harassment;
- the ability for colleagues to freely chose employment: no forced or bonded labour is permitted;
- working in a healthy and safe environment;
- payment of wages and benefits for a standard working week that meet or exceed the minimum national requirements;
- freedom of association and the right to collective bargaining;
- the long-term objective of eliminating child labour globally.

Underpinning these values are our internal policies, including Health and Safety, Equal Opportunities, Dignity at Work and Whistleblowing, among others. These policies reflect our continuing commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to eliminate slavery and human trafficking from our supply chain. They are continually monitored and updated when required. The policies provide our colleagues with a means of raising concerns about unethical conduct without fear of reprisal. Our colleagues and others connected with us are encouraged to speak up if they have any such concerns, with the reassurance that all reports will be fully investigated and appropriate remedial actions taken.



## **Training**

We expect our colleagues to be familiar with the signs of modern slavery and human trafficking and the associated safeguarding requirements. New colleagues undertake mandatory training as part of their induction programme and there are annual refreshers for all staff. This training is delivered both face to face and via our online Learning Management System.

Our leadership teams and managers are coached and encouraged to monitor the wellbeing of their teams, including all agency workers. We also provide access to our Employee Assistant Programme, which provides a wide range of confidential support services for our colleagues. Awareness is regularly reinforced through internal communications and policy updates.

## **Our Supply Chain**

Our current supply chain supports our business in the following ways:

- arranging the supply of goods and services (some by contractors) to the business
- arranging the supply of agency workers to support the business's staffing requirements
- the purchase of goods and services from all over the world, ranging from furniture, fixtures and equipment to operating supplies, and many types of services, including outsourced cleaning services, maintenance services, consulting services and other similar services.

We recognise that the use of foreign and migrant labour by suppliers within the UK and overseas is a particular risk area for our business.

To limit the ability for third parties to exercise control over earnings, our colleagues' wages must be paid into bank accounts in their own names.

We expect all members of our supply chain to adopt values and practices which are consistent with our own. We conduct pre-engagement due diligence of all new suppliers with ongoing monitoring thereafter. All contracts of engagement with suppliers must include provisions for compliance with UK legislation (including specifically the Modern Slavery Act 2015), as well as for termination if the supplier violates any laws which prohibit forced labour, slavery and human trafficking.

## **Actions during 2024**

We continue to monitor risk areas within our supply chain and our business generally and to take the necessary steps to mitigate the risk of slavery, human trafficking or exploitation occurring. We will not support or deal with any business knowingly involved in slavery, human trafficking, child or sexual exploitation and we will protect whistle-blowers. To the extent any existing or new supplier to our business is found to be so knowingly involved, we will cease all dealings with them.



**Mohammed Alawadhi**  
**Managing Director**  
**APML Estate Limited**

**30 June 2025**