



MODERN SLAVERY ACT STATEMENT

31 December 2022

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 2022.

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:

- high ethical standards of operation and employee welfare;
- equal treatment of employees 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 of employees 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 written policies which include Health and Safety, Equal Opportunities, Dignity at Work and Whistleblowing, among others. These policies provide for a means of raising concerns about unethical conduct without fear of reprisal. Employees and others connected with us are encouraged to speak up if they have any such concerns. All reports will be fully investigated and appropriate remedial actions taken.

Our 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. To limit the ability for third parties to exercise control over earnings, wages are required to be paid into bank accounts in our colleagues’ own names.

Our Supply Chain



We are committed to ensuring that all those in our supply chain adopt values and practices which are consistent with our own. 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.

Actions during 2022

Our code of practice for engaging new suppliers remains well established. This practice requires pre-contract due diligence of all suppliers to be conducted and monitored and for all contracts to include provisions for compliance with UK legislation (including specifically the Modern Slavery Act 2015) and for termination if the supplier violates any laws which prohibit forced labour, slavery and human trafficking.

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.

Within the business, our staff continue to receive regular mandatory training on current anti-slavery legislation. New joiners are also required to complete this training as part of their initial induction period. We continue to update our policies and procedures on an ongoing basis to ensure we maintain appropriate safeguards against the mistreatment of persons involved in our business or supply chain.

A handwritten signature in black ink, appearing to read 'Mohammed S. Alawadhi', written over a horizontal line.

Mohammed S. Alawadhi
Managing Director
APML Estate Limited

30 June 2023