

intu Anti-Modern Slavery Policy

Overview and Scope

From October 2015, all UK companies with an annual turnover exceeding £36m must report on the steps they have taken to address modern slavery within their supply chains.

intu has long made clear its commitment to the human rights of everyone we work with; modern slavery is no exception.

This policy sets our position in relation to modern slavery within our supply chain and the standards we expect our suppliers, contractors and consultants within the intu group supply chain (each a “**Supplier**”) to adhere to.

Intu own and manage many of the country’s most popular shopping centres, have a growing online presence and an expanding portfolio in Spain. We’re passionate about giving people their perfect shopping experience. With 21 centres across the UK and Spain, our whole business is focused on creating the best places for shopping and leisure, so that customers visit more often and stay longer.

We procure the raw materials, products and services required during the design and development of our property portfolio, and for the on-going management and operation of these properties. We have mapped our supply chain to assess the potential risk areas and have identified the following

1. High risk sectors – construction, temporary labour
2. High risk materials – construction materials, decorations

Training

We have developed a training program for our key personnel across the business, for those dealing directly with suppliers on local purchasing and centrally in our group tender processes.

Assessment and key performance indicators

Our suppliers are assessed and this policy forms part of our business codes of practise as such our supply chain partners are expected to comply with these standards. KPI’s are being developed and will be reported on in future Anti-Modern Slavery statements.

Application

1. The Supplier is required to adhere to intu’s Anti-Modern Slavery Standards as set out in this policy (the “**Standards**”).
2. The Supplier is obliged to alert intu of any breaches in terms of the Standards and Modern Slavery Act 2015 that are relevant to intu¹.

¹ The definition of relevant is anything directly impacting intu, from our contract and indirectly, that may be seen to impact intu’s operations or reputation

3. In relation to any breaches, the Supplier must notify intu of any remedial action that is being taken with timescales for resolution and provide updates as the resolution progresses.
4. Should the Supplier not cooperate, intu will escalate the issue internally and an assessment of termination of contract will be made on a case-by-case basis.

Standards

Forced or involuntary labour

Any workers of the Supplier (each a “**Worker**”) shall not be subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary and Workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.

Recruitment fees

Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.

Document retention

Confiscating or withholding Worker identity documents or other valuable items, including work permits and travel documentation (e.g. passports) of any Worker is strictly prohibited. The retention of personal documents shall not be used as a means to bind Workers to employment or to restrict their freedom of movement.

Contracts of employment

Written contracts of employment shall be provided to all relevant Workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions. Workers shall be provided with their employment contract prior to deployment.

Deposits

Workers shall not be required to lodge deposits or security payments at any time.

Humane treatment

Any workplace of the Supplier shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all Workers, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of Workers; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour. The use or threat of physical or sexual violence, harassment and intimidation against a Worker, his or her family, or close associates, is strictly prohibited.

Workplace equality

All Workers, irrespective of their nationality or legal status, shall be treated fairly and equally and no form of discrimination is to be engaged in, or supported by, the Supplier in hiring, employment terms, remuneration, access to training, promotion, termination or retirement procedures or decisions.

Wages and benefits

All Workers shall be paid at least the minimum wage required by applicable laws, and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to Workers, in accordance with national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorised by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of Workers. Clear and transparent information shall be provided to Workers about hours worked, rates of pay, and the calculation of legal deductions. All Workers must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure, or to keep Workers tied to the employer or to their jobs. Workers shall not be held in debt bondage or forced to work in order to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

Working hours

Workers shall not be forced to work in excess of the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week, and total working hours including overtime shall not exceed sixty. All overtime shall be purely voluntary, unless part of a legally recognized collective bargaining agreement. No Worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No Worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas. We expect workers will be allowed sufficient holidays to comply with the relevant national law.

Freedom of movement and personal freedom

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, such as employer- or recruiter-operated residences; nor shall any other coercive means be used to restrict Workers' freedom of movement or personal freedom. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

Grievance procedure

An effective grievance procedure shall be established to ensure that any Worker, acting individually or with other Workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

Private employment agencies and labour recruiters

When the subcontracting of recruitment and hiring is necessary, Suppliers shall ensure that the labour agencies they engage operate legally, are certified or licensed by the competent

authority, and do not engage in fraudulent behaviour that places Workers at risk of forced labour or trafficking for labour exploitation.

Duty to report

It is important any concerns are reported. intu has its own whistleblowing policy and hotline (0207 960 1214 or email whistleblow@intu.co.uk). In addition, the UK government has an independent hotline that can be used to record suspicions or incidences of slavery or mistreatment of people (08000 12 17 00).

Related policies and standards

This policy should be read in conjunction with intu's other applicable policies, including but not limited to intu's Supply Chain, Business Code of Practice, Corporate Responsibility (CR), Group Health & Safety and Environmental policies.

References

intu expects Suppliers to adhere to all relevant national and international laws, as well as the following Conventions:

UN Convention

[UN Declaration of Human Rights - Article 4](#)

"No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms."

International Labour Organization Conventions

[ILO Forced Labour Convention, 1930 \(No. 29\) - Article 1](#)

Provides a definition of forced labour as "any work or service exacted under menace of any penalty to which a person has not offered himself voluntarily"

[Abolition of Forced Labour Convention, 1957 \(No. 105\) - Article 1](#)

Signatory states commit to suppress and not to make use of any form of forced or compulsory labour.

[ILO Protocol of 2014 to the Forced Labour Convention, 1930 - Article 1](#)

Signatory states commit to measures to prevent and eliminate its use, to provide victims with protection and access to appropriate and effective remedies, such as compensation, and to sanction the perpetrators of forced or compulsory labour.

["Palermo Protocol" – Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Girls, 2000](#)

Provides the first internationally recognised definition of human trafficking – and defines it as serious of acts (committed by a number of means for certain purpose).