

Modern Slavery Act

Modern Slavery Act Disclosure 2019

Introduction

This statement relates to intu's calendar financial year for 2019.

Modern Slavery is a prevalent and growing issue and we know that we are not immune to the risks global supply chains carry. Modern slavery includes forced and bonded labour, servitude and human trafficking.

Intu is committed to behaving in a socially responsible way. We hold the BITC Community Mark, which recognises our contribution to our communities and our positive impacts for society.

Intu has a zero tolerance stance in relation to modern slavery and we extend this to our suppliers and all that we work with.

Our business

We own and manage shopping centres in the UK and Spain. In 2013, intu created intu Retail Services to bring all the frontline staff working at our centres in-house to deliver an integrated facilities management service. We invest in our people, having been awarded Silver in Investors in People accreditation.

Our policies

Our Code of Conduct sets out how we expect our employees to behave; this includes in respect to each other, and is underpinned by our values to act fairly.

Our Modern Slavery and Human Rights Policy can be found on our website alongside all corporate policies that we expect all supply chain partners to adhere to.

Due diligence

Intu carried out an internal audit to see how prepared the Group was to address modern slavery in the supply chain. The audit found that the necessary requirements for Modern Slavery Act compliance have been considered and an implementation process was undertaken.

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Our supply chain

We manage our centres ourselves, but we still rely on a number of suppliers to operate our business. Our supply chain includes services related to the purchase, sale and development of real estate, construction and property management services.

Our supply chain policy that sets out our standards for supply chain partners in meeting our objectives of value for money while maintaining environmental ethical and health and safety standards.

Assessment of modern slavery within our supply chain

We have carried out a high level assessment of our supply chain to identify our high risk areas.

Construction was identified as the highest risk part of our supply chain operations and within this, brick manufacturing as our key area of risk. We have also identified two areas within our direct operations that are a potential risk factor: intu Retail Services procurement and marketing procurement (as our highest spend area).

Embedding respect: how we are working with our suppliers

We work with our suppliers to ensure they meet our standards. We recognise the importance on good relationships with suppliers to meet our supply chain objectives. We maintain an open and transparent dialogue with:

- Regular tendering
- Supplier screening and questions
- Codes of conduct for supply chain, setting out supplier responsibility
- Monitoring and continuous improvement
- Reviewing supply chain risks

Our people

Educating and empowering colleagues

To tackle modern slavery within our supply chain, awareness and education are of prime importance. Key intu staff were provided with training around modern slavery.

We have set two implementation KPIs to track how well modern slavery awareness has been embedded into our operations and supply chain:

1. Number of staff trained
2. Number of suppliers communicated to

A safe and confidential route to whistle blow

As well as making our people aware of the risks and signs of modern slavery we have provided avenues for our people to raise any concerns. We believe it is everyone's job to be vigilant and report any suspicions.

We have provided all our people with information on contacting intu's dedicated whistleblowing confidential hot line. This is in addition to the government's modern slavery reporting hot line.

We plan to review our policy and KPIs periodically to make sure they are fit for purpose.

Matthew Roberts

intu Chief Executive