



TT Group  
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## TT Group's Slavery and Human Trafficking Statement

This statement is being made by TTRE Group Limited on behalf of itself and its subsidiaries which are operating in the United Kingdom, and the subsidiaries of Tele-Strategic Land Limited which are operating in the United Kingdom (together TT Group).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) and sets out the steps that TT Group has taken, and continues to take, to prevent modern slavery and human trafficking in its business and supply chain. This statement also constitutes our slavery and human trafficking statement for the financial year ended 31 March 2022.

### About TT Group

TT Group is the largest privately-owned property company in the UK, operating in property partnerships, investment, development and strategic land, with a presence in every city and major town in the UK. We have an established £9 billion UK-wide portfolio of 12,000 properties with over 10,000 homes in the pipeline for development.

TT Group has over 200 employees in London, Leeds, and other UK regions.

### Our statement

TT Group believes that human rights are an absolute and universal standard. TT Group is opposed to all forms of slavery, human trafficking, forced labour or child labour and it will not do business with any organisation that it believes is involved in these activities.

TT Group considers that the risk of slavery, human trafficking or child labour taking place within its business and its supply chain is low but we understand that risks do exist. We attribute this low risk assessment largely to our industry, the risk profile of our tenants which we mitigate and monitor through the policies and procedures we have in place (see further "Policy & Training" below). Nevertheless, TT Group will continue to monitor its business and supply chain, including having regard to any significant changes concerning its suppliers. If we discover or receive any suspicions of actual or potential violations of the Act, we will investigate thoroughly and take appropriate action, up to and including the termination of employees or suppliers found to be in violation of the Act.

### Policy & Training

TT Group will not tolerate any form of modern slavery occurring in our supply chain or any part of our business, and our approach is enshrined within TT Group's Slavery and Human Trafficking Policy, which was last updated on 24 November 2022 (the Slavery Policy). The Slavery Policy is applicable to all persons working for TT Group or on its behalf in any capacity,

including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

All staff who manage the on-boarding of TT Group's new suppliers receive appropriate training to assist them in recognising the risks of modern slavery and human trafficking in our business and supply chains and are required to follow the supplier evaluation process as described below. Training to wider staff on the Slavery Policy is delivered on an ad-hoc basis.

Our Slavery and Human Trafficking Policy, along with our Sustainable Procurement Policy, Corporate Social Responsibility Policy, Anti-Bribery and Corruption and Whistleblowing policies reflect our ongoing ethical practices and the integrity in which we conduct our business.

All staff are encouraged to identify and report any potential breaches of the Act or suspicions of anti-slavery and human trafficking within its business and its supply chain.



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### **Our Supply Chain**

TT Group has a relationship with over 1000 suppliers, the major suppliers being professional advisors, property agents and businesses within the property industry, the majority of which are based and operate in the United Kingdom. We have major supplier contracts with large and reputable companies that provide services to us across the United Kingdom in areas such as cleaning, security, maintenance and portage, each of which could be deemed a modern slavery risk.

As a procurer, it is our responsibility to periodically check that our supply chain maintains high standards that we set for ourselves and that our clients rightly expect. We will not tolerate any form of modern slavery or human trafficking in our supply chains or in any part of our business. We demonstrate this by acting ethically and with integrity in all our business relationships, and by implementing and enforcing adequate and proportionate systems and controls.

Supplier diversity is also important to us, and where appropriate we engage with, and support small, medium-sized and social enterprises, having previously been awarded the 'We Buy Social' accreditation from Social Enterprise UK, acknowledging TT Group's commitment to socially responsible procurement.

### **Supply Chain Evaluation and Risk Assessment**

The board of the UK group take responsibility and accountability for this statement as well as the provisions relevant to any suppliers that provide services to TT Group. All new suppliers who wish to contract with TT Group must be verified and approved by either the group finance director or his delegate in addition to a compulsory supplier evaluation process undertaken by TT Group's Finance function.

We evaluate each supplier on the basis of responses to Supplier Management Questionnaires (SMQs). We do not begin evaluation of new suppliers until they have provided all information which is requested in the SMQs, nor are suppliers added to TT Group's supply chain unless and until satisfactory responses to the SMQs have been provided. The SMQs require suppliers to confirm that:

- They have taken and will continue to take appropriate and proportionate action to ensure slavery and human trafficking is not taking place in their business or their supply chains;
- They have not been convicted of any offence under the Modern Slavery Act 2015 (the Act); and
- They will notify TT Group of any breach or potential breach of the Act.

We have taken further steps to annually review our existing top 100 suppliers categorised by annual spend and sought the foregoing confirmations from each of those relevant suppliers together with copies of any relevant policies. In addition, we review on an annual basis the modern slavery statements that are published by each of those relevant suppliers (where such suppliers meet the threshold for reporting on Modern Slavery). All of TT Group's top 100 suppliers have satisfied the supplier evaluation process, and 74% meet the reporting thresholds under the Act and publish their own slavery and human trafficking statement.

### **Our Ongoing Commitment**

TT Group recognises its responsibility to ensure that its policies and systems reflect a zero tolerance of any forms of slavery, human trafficking, forced labour and child labour. TT Group review its policies, processes and procedures, including staff training, to ensure that these issues remain effectively embedded in our business in accordance with the Act and best practices.

We will also continue to monitor our suppliers in the year ahead.

We will also continue to review our processes and monitor our suppliers in the year ahead.

This statement is made pursuant to section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2022.

The statement was approved by the board of TTRE Group Limited (the Board) on 24 November 2022 and signed on behalf of the Board by Russell Gurnhill, Chief Executive Officer, TT Group.



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**Russell Gurnhill**

Director and Chief Executive Officer

On behalf of TTRE Group Limited and its subsidiaries which are operating in the United Kingdom, and the subsidiaries of Tele-Strategic Land Limited which are operating in the United Kingdom, including but not limited to:

- Empire LIH Limited
- Lands Improvement Group Limited
- Telereal Services Limited
- Trillium Property Services Limited
- Telereal Property Developments 1 Limited