



Q U I N T A I N

QUINTAIN LIMITED
(‘QUINTAIN’ OR ‘THE COMPANY’)
MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 (‘the Act’) in relation to the financial year ended 31 December 2017. It sets out the actions Quintain has taken, and is proposing to take, to address the risk of slavery or human trafficking occurring in its business or supply chains.

Introduction

At Quintain we are absolutely committed to preventing slavery and human trafficking in our business and will seek to ensure that our supply chains are free from slavery and human trafficking.

Our business

Quintain is a UK property investment and development company based in London. Our largest project is Wembley Park, covering approximately 85 acres of land around the UK’s largest National Stadium in North West London. Quintain has completed more than 2.6 million sq ft of mixed use development at Wembley, including London’s first retail outlet centre which now attracts approximately 7 million visitors a year. To date we have built 1,350 homes at Wembley Park and will have 3,100 more under construction during 2018, with outline consent in place for the delivery of a further 3,000.

Our supply chain

Quintain is committed to ensuring that its suppliers adhere to the same high standards of ethics it embraces. In order to supply goods or services to Quintain, an organisation must register via Quintain’s Supplier Portal to be a preferred supplier. Individuals and organisations are required to confirm that they provide inter alia safe working conditions, treat workers fairly, pay the minimum wage and comply with all (or the equivalent of) UK employment-related regulations. Quintain periodically makes enquiries of suppliers to ensure their policies are in place and adhered to. Failure to maintain or comply with such policies or regulations may lead to the termination of the business relationship.

Quintain undertakes due diligence through the Supplier Portal to evaluate potential suppliers prior to engagement, and regularly reviews its existing suppliers. Due diligence and periodic reviews cover, among other areas, the following policies and risks:

- Health and safety
- Employment conditions including payment of the minimum wage
- Anti-bribery and corruption
- Payment practices.

Questions relating to Modern slavery and related offences have been added to the Supplier Portal and all suppliers have been contacted to confirm their compliance with the Act.

At Wembley Park, Quintain’s construction programme is being delivered through a number of principal UK-based building contractors. A number of these Contractors form part of a framework agreement (‘Framework Contractors’). Each of our Framework Contractors has, at our request confirmed their policy and actions taken to prevent slavery and human trafficking. The terms of our Framework Agreements have also been enhanced to include clauses addressing compliance with the Act. The remaining Contractors who are not part of Quintain’s framework agreement have been vetted via the Quintain Supplier Portal to ensure they adhere to our standards and ethics.

Responses to our enquiries have not identified any high risk areas in our supply chain.

Our employees

Quintain has around 115 employees based in the UK. Quintain's code of conduct makes clear the actions and behaviour expected of employees when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour in business dealings and managing our supply chain.

The Company adheres to all relevant employment legislation and we are committed to creating a work environment where everyone is treated with dignity and respect. The Human Resources team, supported by the Company Secretary, oversees the induction and training of all staff in the Company's anti-corruption policies and the code of conduct.

Quintain has a Whistleblowing Policy including a clear escalation process for employees and contractors to raise concerns relating to the Company's business practices, which will include the crimes of slavery and human trafficking.

Quintain uses only specified, reputable employment agencies to source temporary or permanent employees and always verifies the practices of the agency through the Supplier Portal.

We are confident that there is a very low risk of slavery or human trafficking in the employment or engagement of our own employees.

Employee training

To ensure a good level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, we will provide appropriate specialist training to relevant members of staff and a general briefing to all employees.

Future developments

As we seek to continually improve our approach to and identification of the risks of modern slavery, in particular we will:

- continue to work with our Framework Contractors and Non-Framework Contractors to monitor and identify any emerging risks of slavery and human trafficking in our construction supply chain;
- monitor our preferred suppliers for adherence to best practice;
- focus on specialist training for colleagues with responsibility for supply chain management and procurement; and
- provide induction and refresher training for all employees.

Quintain Group

For the avoidance of doubt, this statement and the policies and procedures described to prevent slavery and human trafficking applies to all of Quintain Limited's Group subsidiaries, including but not limited to Quintain NW01 Developments Limited and Quintain Alto Developments Limited.

Board approval

This statement has been approved by the Quintain Board and will be reviewed and updated annually.

For and on behalf of the Board

Angus Dodd

Chief Executive

Date: 23 March 2018 (updated 10 December 2018)