



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 2023. 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 property investment and development company based in London. Our largest project at Wembley Park, covers approximately 85 acres of land around the UK's National Stadium in North West London. Quintain has planning consent to complete more than 10.3 million sq ft of mixed use development at Wembley Park, of which 6.6 million sq ft has been delivered to date. This includes London's first retail outlet centre which attracts approximately 5.4 million visitors a year, post the Covid-19 pandemic. As at 31 December 2023 we had 3,390 build to rent (BtR) homes, under Quintain Living's management and built 5,176 homes across all tenures within Quintain's Masterplan at Wembley Park have been built and a further 769 homes are under construction. Wembley Park welcomes on average 16.5 million visitors a year up from 4 million in 2004.

All of the private and discount market rent BtR apartments at Wembley Park are managed by Quintain's wholly-owned residential rental management company branded ‘Quintain Living’.

Quintain established a subsidiary in Ireland during 2019 to provide development management services across 460 acres of prime assets in Ireland at Adamstown, Clonburris, Portmarnock and Cherrywood. However, during the reporting year, the business trading as Quintain Developments Ireland Limited (‘Quintain Ireland’), responsible for the residential development in Ireland, was sold to LSREF 4 Clear Investments S.À R.L. (‘Clear Investments’). Following the transfer on 21st April 2023 Clear Investments took on the responsibility for Quintain Ireland's assets under construction.

Over time the company seeks to be recognised as the United Kingdom leading build-to-rent and mixed-use development and investment specialist.

Our supply chain

Quintain is committed to ensuring that its suppliers adhere to the same high standards of ethics it embraces. To supply goods or services to Quintain, an organisation must register via Quintain's Supplier Portals 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/London Living wage, as applicable and comply with all (or the equivalent of) UK and previously Ireland 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
- Valid insurances for Public and Employers Liability, and Professional Indemnity

Questions relating to Modern slavery and related offences have been added to the Supplier Portals and all suppliers with a turnover in excess of the £36 million threshold specified by the Act have been contacted to confirm their compliance with the Act (or equivalent legislation in Ireland as previously applicable).

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 ('UK 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.

Prior to the sale during the reporting period, a similar framework had been put in place for the delivery of Quintain's construction programme for the portfolio of developments in Ireland. Each UK Framework Contractor had at our request confirmed their policy and actions taken to prevent slavery and human trafficking for their operations in Ireland. Each Ireland based building contractor ('Irish Framework Contractor') had, at our request confirmed their policy and actions taken to comply with the equivalent legislation in Ireland, being the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013.

The remaining contractors who are not part of Quintain's framework agreements have been vetted via the Quintain Supplier Portals to ensure they adhere to our standards and ethics. Suppliers must complete a questionnaire within the Portal that includes but is not limited to requiring any sanction disclosures and clarifying the source of their workforces. The responses are then checked and validated by Quintain's Procurement Team. We can confirm that their responses to our enquiries have not identified any high risk areas in our supply chain to date.

Our employees

At the end of the reporting year, Quintain had 174 employees based in the UK and ahead of the sale during the reporting period 48 in Ireland. 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 Portals.

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 UK 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 also applies to all of Quintain Limited's Group subsidiaries.

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

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James Saunders
Chief Executive

Date: 24 April 2024