

## LSL Group Modern Slavery Statement 2021

In accordance with the Modern Slavery Act 2015 (**Act**), we, LSL Property Services Plc (**LSL Group**), have published this statement on behalf of the LSL Group and our relevant subsidiary companies (specifically your-move.co.uk Limited, Reeds Rains Limited, LSLi Limited, Marsh & Parsons Limited and e.surv Limited) (**Subsidiaries**) (**Statement**). This Statement sets out the controls relevant to all members of the LSL Group with a focus on the steps that our Subsidiaries have taken during the financial year ending 31<sup>st</sup> December 2021 to prevent modern slavery and human trafficking from occurring within our businesses and supply chains.

### Introduction

This Statement builds upon the last statement published on behalf of the LSL Group in June 2021 (for the financial year ending 31<sup>st</sup> December 2020).

We recognise the continued existence of slavery and human trafficking, the significance of its impact on its victims and society and the part we play in eradicating it from society and the businesses with which we work. This is why our business is working hard to detect it as part of a permanent, ongoing process of review and improvement. During 2021, in line with our commitment to conduct business in a socially responsible way, we continued to focus attention on identifying and monitoring potential risks of modern slavery within our businesses and supply chains, and on taking steps to manage and eliminate any such risks.

### LSL Group Businesses

We are a leading provider of residential property services to our key customer groups.

- Services to consumers include: mortgages and financial services including pure protection and general insurance brokerage services, and residential sales, lettings, surveying and conveyancing.
- Services to mortgage lenders include: valuations and panel management services, asset management and property management services.

For further information about our services please visit [www.lslps.co.uk](http://www.lslps.co.uk).

We report, for financial reporting purposes, in three segments: Estate Agency; Financial Services; and Surveying and Valuation Services. The Financial Services segment incorporates all of LSL Group's Financial Services businesses. The Estate Agency segment primarily incorporates the Estate Agency networks (Your Move, Reeds Rains, LSLi and Marsh & Parsons) and Asset Management. The Surveying and Valuation Services segment represents e.surv.

As at 31<sup>st</sup> December 2021 we, through all LSL Group businesses, employed circa 4,600 people across the UK, where our business operations are entirely based.

### LSL Group Approach

The LSL Board assesses overall exposure to modern slavery for members of the LSL Group to be lower than other sectors given that the residential property services sector in which these businesses operate, the types of services they procure and the fact that these business operations and those of

the majority of its suppliers are primarily based in the UK. However, the LSL Board recognises that risk still remains and that certain supplier types and engagement with other industries for example, present a higher risk than others, such as in recruitment, facilities services and the use of subcontractors. Risk mitigation is addressed below under *Subsidiaries' Supply Chains and Activities*.

Accountability for the above is with LSL Group with responsibility sitting with the Subsidiaries.

### *LSL Group Due Diligence*

We continue to identify our supply chains as the main area of risk and exposure to modern slavery. We are continuing to develop and enhance our processes and controls to deliver a due diligence framework addressing suppliers and supply chain engagement throughout the LSL Group and its Subsidiaries. The risk assessment criteria and processes determine which suppliers should be assessed via first and second stage risk assessments, with those identified as 'of concern' requiring more detailed due diligence surrounding the supplier's own mitigation of modern slavery risks as well as their business practices and supply chains. We are continually reviewing the LSL Group supplier risk management framework and its methods of detection and protection surrounding supplier risk, from onboarding, throughout the management of the supplier relationship and the off-boarding of our suppliers.

### *LSL Group Policies and Contractual Provisions*

LSL Group has a dedicated anti-slavery and human trafficking policy (**Policy**) which works in combination with LSL Group's established whistleblowing policy. Both policies form part of the LSL Group's Combined Ethics Policy which applies to all LSL Group employees and its Subsidiaries.

The Policy has two main aims:

- to set out the responsibilities of the LSL Group and LSL Group employees in observing the Policy and to provide information and guidance to those working for the LSL Group in observing and upholding the Policy; and
- to provide information and guidance to those working for the LSL Group on how to identify and escalate potential modern slavery issues.

The Policy was reviewed during the 2021 financial year and will continue to be reviewed and updated annually in order to take account of changing areas of risk, specifically identified issues and industry trends.

In addition, the LSL Group continues to implement provisions within supply agreements which place prevention, control and notification measures on suppliers. This language is reviewed periodically.

We expect our suppliers to adopt the same high standards that we do and to have fair employment practices. We continue to require all substantial suppliers and other selected suppliers to comply with our Supplier Code of Conduct (**Code**). The Code sets out the standards with which we expect our suppliers to comply in relation to working hours, wages and benefits, health and safety in the workplace and prohibits the use of forced, compulsory and child labour. We may cease to engage suppliers if they fail to comply with the Code.

*LSL Group Training*

LSL Group continues to strive to raise awareness and ensure that its employees are well equipped to identify and report any potential incidences of modern slavery. During the last year, LSL Group has continued to deliver in-house training to its Group employees. All LSL Group employees are made aware of the requirements under the Act and how to identify and report issues of modern slavery through the Policy.

**Subsidiaries’ Supply Chains and Activities**

Members of the Subsidiaries have established direct relationships with a number of primarily UK-based suppliers who deliver a variety of services including: professional services<sup>1</sup>, utilities and telecoms, and facilities management. As part of service delivery, members of the Subsidiaries procure services not just for themselves, but also for the benefit of some of the customers of other group companies (including property management services and contractors).

The vast majority of services are procured via specialist individuals employed or engaged by members of the LSL Group.

To mitigate the risk that stems from supply chains, as relevant to this Statement, Subsidiaries have focused on increasing the visibility of the Code within its suppliers, promoting its aims and objectives for anti-slavery and human trafficking and ensuring that the Code is properly adhered to.

The Subsidiaries continue to place stringent checks and safeguards on recruitment agencies and monitor their own internal recruitment processes to ensure that they meet the minimum legal requirements.

As part of this, and as relevant to this Statement, Subsidiary companies comply with relevant legislation including the Immigration, Asylum and Nationality Act 2006 and apply frameworks to ensure that appropriate checks are carried out to maintain compliance.

*KPI Monitoring*

Set out below is a summary of the Subsidiaries’ performance against the KPIs set by the LSL Board in last year’s statement. We appreciate that these KPIs are qualitative and, as addressed below, we are engaging with suppliers who will provide us with the ability to significantly enhance these and the method through which we conduct due diligence and risk assessment:

<b>KPI from the 2020 Statement</b>	<b>Performance during 2021</b>
Developing a better understanding of modern slavery risks in LSL Group supply chains through more detailed mapping of supply chains and increasing awareness of modern slavery risks that LSL Group suppliers are facing;	Improvements have continued in the discovery of supplier risk and increasing the visibility of the supply chain. The Subsidiaries’ focus has, to date, been predominantly on review. Risk frameworks have been developed to include a modern slavery question in annual questionnaires for suppliers to attest to. As part of the commitment to improvement however, the framework will be enhanced to deal with

<sup>1</sup> IT, accountancy, insurance, legal, marketing, consultancy and recruitment services

	the high number of suppliers engaged. To do so there will be a review of the efficiency and effectiveness of the risk assessment process, addressing identified areas of development.
Undertaking audits to assess supplier compliance with the Code and contractual obligations relating to modern slavery; and	Where required, attestations have been issued to suppliers on the basis of providing assurance, and desktop audits completed. Supplier questionnaires undergo a risk assessment and acceptance process. Tracking of questionnaire completion rates will commence in 2022. This will be developed as part of an overarching due diligence framework to become more comprehensive and enhance the understanding of and focus on key risk areas and our response.
Integrating modern slavery risk assessment and risk mitigation tools into procurement processes.	Attention has been focused on modern slavery risk aversion in procurement. Supplier relationship management practices will be developed and formalised surrounding 'in-life monitoring'.

Over the next year, the Subsidiaries intend to focus on the following:

- Enhance our supplier management framework in a scalable way, from onboarding, through in-life monitoring and off-boarding, including detection, tracking, auditing, transparency and establishing a framework to address supplier non-compliance.
- Continuing to develop our focus on significant risk areas through better understanding
- Benchmarking our practice against the (inter)national, regional and industry landscapes

To achieve the above, we intend to engage a provider who will aid us in enhancing our supply chain due diligence.

This statement has been approved on behalf of the LSL Group and the Subsidiaries by the LSL Board on 27<sup>th</sup> May 2022.

Signed by:

**David Stewart, Group Chief Executive Officer** on behalf of LSL Property Services plc and its Subsidiaries.