

# MODERN SLAVERY STATEMENT 2023



UNIBAIL-RODAMCO-WESTFIELD

## Introduction

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Section 54 of the UK Modern Slavery Act 2015 (the 'Act') requires Westfield Europe Ltd ("Westfield") to prepare an annual statement that details the actions it has taken during the financial year to ensure modern slavery is not taking place in its operations and supply chains.

Westfield is fully committed to playing its part in tackling modern slavery and supports the drive to encourage transparency in supply chains. We support ethical labour practices and work collaboratively with our supply chain with a shared aim of eliminating modern slavery.

Raising awareness is a key part of the work we do to mitigate the risks of modern slavery, both in our own business operations and those of our supply chain. We expect our suppliers and their subcontractors and suppliers to be fully accountable, and to hold their own contractors to the same high standards.

This statement outlines the actions that Westfield has taken to identify, assess, address, and mitigate modern slavery for the financial year ending 31<sup>st</sup> December 2023.

## About Westfield

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Westfield is part of the Unibail-Rodamco-Westfield Group ("URW Group"). Westfield's business is to develop, design, construct and operate flagship real estate assets in the UK, contributing to URW Group's platform of unique, sustainability-driven retail, office and lifestyle destinations that connect people through extraordinary, meaningful shared experiences.

Our supply chain is complex, extensive, and global with a different supply chain for our design, development and construction business and our asset management business. Together our supply chains comprise of consultants, contractors and subcontractors delivering materials, equipment and services and facilities management services such as cleaning, security, car parking management, guest services and waste management.

## Key Focus Areas for 2023

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1. Continue our roll out of training to employees and Tier one suppliers.
2. Further extend due diligence using bespoke self-assessment questionnaires (SAQ's) for high-risk suppliers and contractors.
3. Analyse the data received from the SAQ's and apply the learning to further develop our approach to tackling modern slavery.
4. Progress a victim support action plan, working in collaboration with specialised external partners.

## Our Policies, Procedures and Contracts

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As an owner, developer, and operator of sustainable, high quality real estate assets, operating at the highest ethical standards is key. All employees and directors are required to comply with both Westfield and wider URW Group policies.

Of particular relevance to the detection and prevention of modern slavery in Westfield's business and supply chains are the following policies and procedures:

### Westfield's Modern Slavery Policy

The policy outlines our commitment to mitigate the risk of any form of slavery, servitude, forced or compulsory labour, human trafficking or related and equivalent offences that may exist within Westfield's business and / or supply chain. The policy sets out:

- An overview of the Modern Slavery Act
- Westfield's expectations of its suppliers with respect to the detection and prevention of all aspects of modern slavery
- The training available to Westfield employees and directors
- Westfield's expectations of our employees'
- What a Westfield employee should do if they have concerns about modern slavery in our operations or in our supply chain
- The consequences for Westfields employees in the event of any breach of the Modern Slavery Policy

### URW Group Code of Ethics

URW Group is strictly committed to upholding all fundamental individual and labour rights protections, as well as safeguarding the health, safety, and well-being of its employees. The Code of Ethics describes the values

and principles that URW Group employees are required to respect and adhere to at all times.

The code of ethics requires, among other things, that our employees and directors:

- Behave in a way that does not harm human dignity
- Comply with all applicable laws and regulations including that of anti-bribery and corruption
- Report any circumstances or event which could reasonably be expected to create the appearance of impropriety to the UK General Counsel or URW Group Compliance Officer

### URW Group Human Rights Policy

In 2023 URW Group released its Human Rights Policy which outlines URW Group's dedication to human rights principles and serves as a guiding framework for all employees, contractors, partners, and stakeholders.

### URW Group Responsible Procurement Charter

In 2023 URW Group introduced a Responsible Procurement Charter as an addition to the group purchasing procedures. The charter applies to all supply chain business partners, including suppliers of goods and services, and subcontractors and sets out our expectation that they behave ethically, apply high standards of corporate conduct, and fully comply with all relevant laws.

The Charter is in line with the principles outlined in the United Nations Global Compact, the United Nations Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the Minimum Safeguards of the EU Taxonomy Regulation.

### Westfield's Recruitment Policy

As part of our efforts to tackle modern slavery, Westfield adopted a responsible recruitment policy which states that recruitment costs remain a business cost and will not be charged to our employees or workers, directly or indirectly. This principle also applies in respect of the referral policy as set out in Westfield's recruitment policy, ensuring no fees are paid by employees or workers for such referrals.

### URW Group Grievance and Whistleblowing

The URW Group's Whistleblowing Procedure provides a mechanism for all employees, contractors, suppliers, and stakeholders to raise concerns related to human rights in the form of a URW integrity line, which is designed to give the whistleblower the ability to communicate, while guaranteeing complete confidentiality.

Our mechanisms for reporting ethical labour concerns are designed to be open and transparent, and in line with the UN Guiding Principles.

As part of our awareness-raising activities, we also place posters on our construction sites and in our offices which

include national helpline numbers for individual workers to seek advice and raise concerns about potential cases of modern slavery.

### Westfield's Modern Slavery Escalation Procedure

In 2023 we developed and rolled out the Westfield Modern Slavery Escalation Procedure which describes the steps to be followed if any employee suspects that anyone working for Westfield, including via business partners, suppliers and contractors, or anyone working within our assets, are being subjected to modern slavery or if a worker(s) seek help.

### Other Relevant Policies

In addition to the above policies and procedures, there are ancillary policies and procedures that ensure that a minimum standard of ethical behaviour and social responsibility is adhered to, including:

### URW Group Anti-Corruption Programme

Our Anti-Corruption programme augments our code of ethics and guides our employees on their conduct and reinforces our zero-tolerance approach to bribery.

### Westfield's Health and Safety Policy

Westfield's Health and Safety policy outlines our commitment to high standards of health and safety in the workplace for all our employees and the broader workforce on our construction sites and at our assets.

### Contracts

Westfield's standard supply contracts include, where appropriate, provisions which are specifically targeted at combating the risk of modern slavery.

In summary, the provisions require compliance with the Modern Slavery Act and the need to notify Westfield of any actual or potential incidents, as permitted by any relevant investigating authorities.

In the event of any actual or suspected incidents Westfield reserve the right to terminate the contract. Our contracts also include the right to audit our supply chains to ensure compliance with our supplier standards.

## Governance

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As part of our programme of continuing development, we have reviewed and updated our governance of modern slavery. We have extended membership of our Modern Slavery Strategic Working Group ("MSSWG") to include representatives from all departments in our business including Centre Management, Human Resources, Construction, Development, Procurement, and Leasing.

The MSSWG is chaired by the Head of Sustainability UK and sponsored by the Head of Construction, a member of

Westfield's Country Management Team (CMT). The MSSWG meets regularly and has been overseeing the continuing development of Westfield's modern slavery strategy and associated risk management procedures.

The MSSWG shall report to CMT on a biannual basis in order that CMT:

- Remain informed of modern slavery and other ethical labour-related issues that are relevant to the UK business
- Monitor and oversee progress against the UK strategic implementation plan for addressing modern slavery and other ethical labour-related issues
- Consider modern slavery and other ethical labour-related issues in relevant business plans and decisions
- Review industry trends and assess their impact

The MSSWG consults and informs the CMT on any new developments, highlights any emerging or immediate risks, and provides information on the due diligence undertaken across the business.

## Due Diligence and Risk Management

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### Supply Chain Procurement and Screening

As part of our supplier selection process, we undertake pre-qualification checks to verify that suppliers have policies and procedures in place to comply with the Modern Slavery Act. Thereafter, following supplier selection, we evaluate our suppliers according to the level of inherent risk associated with the goods or services provided by the supplier e.g., if the goods or services are likely to involve engagement with vulnerable workers.

Each supplier rated as high risk is required to complete a self-assessment questionnaire ("SAQ") to gather more information on the potential risks associated with their workforce and supply chain as well as information on their approach to tackling modern slavery and the mitigation they have in place to address the risks. We are then able to develop and agree (if necessary) a Corrective Action Plan based on the SAQ responses, which can then be monitored, and progress evaluated.

We reserve the right to terminate a contract where there is a sustained lack of progress against any Corrective Action Plan in place.

In all supplier contracts, regardless of size or risk, we have added a new responsible procurement clause which refers to the Responsible Procurement Charter that outlines our expectation that suppliers behave ethically, apply high standards of corporate conduct and to fully comply with all relevant law.

### Additional Due Diligence

As part of our compliance checks, we undertake a "Know Your Partner" screening on any new suppliers and contractors with contract values over £250,000. As part of this due diligence, the URW Group evaluates any violations with respect to corruption, human trafficking, and modern slavery. Any red flags identified are escalated to URW Group's Compliance department.

In accordance with Home Office requirements, we confirm that all Westfield employees have the right to work in the UK.

On our construction sites, all subcontractor operatives undertake a full induction process which covers all health, safety and environmental risks and includes information on modern slavery and how to report concerns or seek help on a confidential basis. Prior to the induction, all operatives voluntarily provide pre-induction information about themselves, their proposed role on the project, relevant CSCS card and identity documents.

Competency checks are carried out to ensure that workers have the appropriate Construction Skills Certification Scheme (CSCS) card for the work they are identified to undertake on the induction form. For Centre Operations, similar checks are required for individuals to complete their security checks and obtain the necessary security card to gain entry to the Centres.

## Training

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Training is a fundamental part of our modern slavery strategy as it is critical to raise awareness of modern slavery and other human rights risks within our business and our supply chains.

We have increased training for our employees, plus high-risk tenants and main (Tier One) suppliers, and we continue to deliver targeted training for those employees who have direct contact with workers in our supply chains. Training delivery has included:

- Training for all our employees on our policies and procedures in our Compliance Book and Code of Ethics
- Targeted in person training for our procurement and front-line managers delivered by Stronger Together.
- Through our sponsorship of 'Stronger Together' we offer funded online and interactive training for all Tier One suppliers and their labour providers.

## Reporting on Key Performance Indicators

In our 2022 Modern Slavery Statement, we outlined five key focus areas, and we are pleased to report our performance in these areas, as follows:

1. We increased training to our employees with 23 attending two in person half day sessions delivered by Stronger Together. Four tenants and main (Tier One) suppliers attended online and interactive workshops.
2. We extended our business partner due diligence by issuing bespoke self-assessment questionnaires (“SAQ’s”) to our higher risk suppliers with 28 being issued in 2023.
3. We continued to analyse the response from the SAQ’s which informed actions on our Modern Slavery Implementation Plan.
4. We continued to work collaboratively with our suppliers on corrective actions following an audit or initial assessment with 2 closed out in 2023.

5. We are progressing a victim support action plan for victims of modern slavery, working in collaboration with an expert partner who specialises in this area.

We have not detected or been made aware of any actual or potential incidents of modern slavery in our operations or in our supply chain during the reporting year.

## Industry Collaboration

Since 2017, Westfield has been a proud sponsor of the Stronger Together Construction and Property Program. Stronger Together is an impact driven, not for profit organisation specialising in responsible recruitment, fair work and tackling labour exploitation.

As part of our active engagement with Stronger Together, and together with fellow Sponsors, we participated in a Collaborative Project which aimed to evaluate capability in two high risk areas of our supply chain, namely Dry Lining and Facilities Management. The output of the project has been captured in a case study below.

### Construction Collaborative Project Case Study

Westfield participated in a Collaborative Project, led by Stronger Together, to review the capability of drylining and facilities management suppliers and sub-contractors to tackle modern slavery and embed labour standards in their business and supply chains.

The insights from this project have been used to inform Stronger Together’s ongoing development on tackling modern slavery within the Construction and Property Sectors. A digital copy of the case study can be downloaded [here](#).

## Our Next Steps

At Westfield we are committed to the highest ethical standards and will continue to review the effectiveness of our policies procedures and training to improve our ability to detect and mitigate any risks of modern slavery within our business and our supply chain.

### Vision

Our vision for 2024 and beyond is to meet the standard “Evolving Good Practice” outlined by the Office of the Independent Anti-Slavery Commissioner (IASC) as:

- External challenge or working groups informing strategy
- Going beyond auditing – deep dives and unannounced visits
- Cascading ethical standards throughout supply chains
- In-depth training for staff in key roles, such as procurement
- Commitment to worker engagement
- Implementing the Employer Pays principle

**For 2024 we have identified the following key actions:**

1. Further enhancement of pre-qualification questionnaire
2. Further improvement of due diligence processes specifically looking at Westfield Business Partner SAQ's to include a bespoke system designed for risk assessing, risk rating and prioritization
3. Additional Modern Slavery Champions to be identified and trained to further raise awareness and maintain peer engagement
4. Develop a training framework and schedule, outlining who receives training, at what level and frequency including supply chain and business partners
5. Communication of the strategic implementation action plan, progress made and future areas of focus, to our suppliers, tenants, and key stakeholders
6. Continue to progress a victim support action plan with an external partner

Westfield publishes this statement on behalf of its UK operations in accordance with section 54 of the UK Modern Slavery Act 2015 for the financial year ending 31<sup>st</sup> December 2023.



Scott Parsons  
Chief Operating Officer  
Westfield Europe Limited