

MODERN DAY SLAVERY POLICY

SDL BTR MANAGEMENT LIMITED – MODERN DAY SLAVERY POLICY

REVIEWED AND UPDATED MARCH 2026

ABOUT THIS POLICY

SDL BTR Lettings & Management Ltd is committed to conducting its businesses in a socially responsible way. We seek to carry out operations in accordance with appropriate ethical standards and be honest and fair in their relationships with customers and suppliers.

As part of this, SDL BTR is dedicated to ensuring that effective systems and controls are in place to safeguard against modern slavery and human trafficking occurring within our businesses or any of our supply chain.

SLAVERY AND HUMAN TRAFFICKING STATEMENT

In accordance with the Modern Slavery Act 2015 Act, SDL BTR has published this statement on behalf of SDL BTR Management Limited and all associated entities. This statement sets the steps that members of SDL BTR have taken to prevent modern slavery and human trafficking from occurring within its business and supply chains.

SDL BTR MANAGEMENT LTD

SDL BTR Management Ltd is a leading provider of property services to its key customer groups:

- Property management services (lettings management including property maintenance)
- Services provided to investors (identifying potential opportunities, supervising development and providing lettings and asset management)

As of 1st July 2024, SDL BTR Management Ltd employed circa 50 people across the UK, where its business operations are entirely based.

SDL BTR SUPPLY CHAINS

SDL BTR Management Ltd have established direct relationships with several primarily UK-based suppliers who deliver a variety of services (for example professional services, utilities and telecoms, and facilities management).

Many services are procured via specialist individuals employed or engaged by members of SDL BTR (relationship managers).

SDL BTR POLICIES AND CONTRACTUAL PROVISIONS

The approach of SDL BTR to the promotion of human rights and ethical issues is contained within SDL BTR HR Policies which include but not limited to:

- Anti-Bribery and Corruption Policy
- Equal Opportunities Policy
- Recruitment Policy
- Whistleblowing Policy
- Grievance Policy
- Anti-Bullying and Harassment Policy

The SDL BTR HR policies apply to all individuals employed or engaged by SDL BTR Management Ltd. Employees can use the whistleblowing policy to report suspected concerns within the business and supply chain.

Since the enactment of the Modern Slavery Act 2015 Act members of SDL BTR have taken steps to seek to ensure that any new agreements with suppliers include an express obligation for suppliers to comply with the Act, to implement due diligence procedures within its own supply chains and notify SDL BTR in the event of any actual or potential incidence of modern slavery.

In the event of a breach of these provisions, members of SDL BTR will seek to resolve any issues with its suppliers and it may also seek to terminate the relationship with the supplier where a resolution is not achieved.

This provision is regularly reviewed, and relevant amendments made.

SDL BTR DUE DILIGENCE

SDL BTR have identified our supply chains as the main area of risk and exposure to modern slavery.

The suppliers used by SDL BTR have been identified as low risk. The suppliers which provide manufactured goods to SDL BTR are very few, limited to marketing providers (providing posters etc), and facilities providers (providing toiletries, snack foods and drink machine products etc.) Other suppliers to SDL BTR mainly provide in-person services, such as maintenance services and recruitment services.

Contractors used by SDL BTR pass through an on-boarding process, which includes terms requiring them to comply with the Act and provide a copy of their modern slavery statement where requested.

SDL BTR AREAS OF WORK

Overall exposure to modern slavery for SDL BTR is lower than other sectors given the nature of the property services sector in which our businesses operate, the types of services we procure and the fact that our business operations and those of the majority of our suppliers are primarily based in the UK.

Notwithstanding the above, SDL BTR is not complacent and understands that the procurement of recruitment and facilities services and the use of subcontractors are practices which may bring about increased risks of modern slavery within supply chains.

Accordingly, SDL BTR is taking steps to mitigate such risks, including:

- Requiring suppliers to implement due diligence procedures for its own suppliers and subcontractors.
- Having in place stringent checks on our recruitment agencies and ensuring our own internal recruitment processes meet the minimum legal requirement.

As part of this, SDL BTR complies with all relevant legislation including the Immigration, Asylum and Nationality Act 2006 and ensures that all appropriate checks are carried out to maintain compliance. If further risks are identified, SDL BTR will consider such risks and take appropriate steps to address any emerging risks.

SDL BTR TRAINING

SDL BTR understand the importance of training employees to enable them to be able to identify risks of modern slavery. All employees receive information that allows them to understand the requirements under the Act in the form of this policy. They also receive our whistleblowing policy, which would allow them to raise concerns anonymously.

MONITORING

SDL BTR appreciates that the approach to combatting modern slavery will have to adapt over time in response to findings following the completion of various risk assessments.