



## **The Arch Company: Slavery and Human Trafficking Statement**

This statement is being made by CDR JV GP Limited on behalf of itself and its subsidiary entities, which are operating and established in the United Kingdom (together **The Arch Company**).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) and sets out the steps that The Arch Company has taken, and continues to take, to prevent modern slavery and human trafficking in its business and supply chain. This statement also constitutes our slavery and human trafficking statement for the financial year ended 31 March 2022.

### **About The Arch Company**

The Arch Company is the UK's largest small business landlord, serving thousands of business owners who make a unique and vital contribution to the UK economy. The Arch Company purchased Network Rail's former commercial property estate in early 2019 - a property portfolio of approximately 5,200 railway arches, business estates, former station buildings and other properties.

We are proud to be the landlord to a diverse, passionate group of small business owners, entrepreneurs and community organisations across England and Wales. Our tenants include car mechanics, bakeries, restaurants, gyms, creatives, brewers, health clinics and many more companies, charities and organisations that make a difference to the communities that they serve.

The Arch Company is a joint venture between the Telereal Trillium Group and Blackstone Property Partners.

The Arch Company has over 206 office-based employees in London, Leeds and other UK regions.

### **Our statement**

The Arch Company believes that human rights are an absolute and universal standard. The Arch Company is opposed to all forms of slavery, human trafficking, forced labour or child labour and it will not do business with any organisation that it believes is involved in these activities.

The Arch Company considers that the risk of slavery, human trafficking or child labour taking place within its business and its supply chain is low but we understand that risks do exist. We attribute the low risk largely to our industry, the risk profile of our tenants which we mitigate and monitor through the policies and procedures we have in place (see further "Policy & Training" below). Nevertheless, The Arch Company will continue to monitor its business and supply chain, including having regard to any



significant changes concerning its suppliers. If we discover or receive any suspicions of actual or potential violations of the Act, we will investigate thoroughly and take appropriate action, up to and including the termination of employees or suppliers found to be in violation of the Act.

### **Policy & Training**

The Arch Company will not tolerate any form of modern slavery occurring in our supply chain or any part of our business, and our approach is enshrined within The Arch Company's Slavery and Human Trafficking Policy dated 14 December 2022 (the **Policy**). The Policy is applicable to all persons working for The Arch Company or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

All staff who manage the on-boarding of The Arch Company's new suppliers receive appropriate training to assist them in recognising the risks of modern slavery and human trafficking in our business and supply chains and are required to follow the supplier evaluation process as described below. Training to wider staff on the Slavery Policy is also delivered on an ad-hoc basis.

Our Slavery and Human Trafficking Policy, along with our Sustainable Procurement Policy, Corporate Social Responsibility Policy, Anti-Bribery and Corruption and Whistleblowing policies reflect our ongoing ethical practices and the integrity in which we conduct our business.

All staff are encouraged to identify and report any potential breaches of the Act or suspicions of slavery and human trafficking within its business and its supply chain. The Arch Company has recently approved a Whistleblowing policy which will provide access to an anonymous third-party Whistleblowing Helpline.

### **Our Supply Chain**

The Arch Company has a relationship with over 200 suppliers, the major suppliers being facilities management, professional advisors, property agents and businesses within the property industry, the majority of which are based and operate in the United Kingdom.

As a procurer, it is our responsibility to periodically check that our supply chain maintains the highest standards that we set for ourselves and that our clients rightly expect. We will not tolerate any form of modern slavery or human trafficking in our supply chains or in any part of our business. We demonstrate this by acting ethically and with integrity in all our business relationships, and by implementing and enforcing adequate and proportionate systems and controls.



We have long-term relationships with our major suppliers, which allows us to gain a thorough understanding of their capabilities and in turn, our suppliers become more adaptable to the needs of our customers. The long-term nature of our relationships gives our suppliers confidence that any investment in innovation or best practice will be recouped during the relationship.

### **Supply Chain Evaluation and Risk Assessment**

The board of The Arch Company take responsibility and accountability for this statement as well as the provisions relevant to any suppliers. All new suppliers who wish to contract with The Arch Company must be approved by the Director of Finance in addition to completing a compulsory supplier checklist and evaluation process undertaken by The Arch Company's Finance function.

We evaluate each supplier on the basis of responses to Supplier Management Questionnaires (**SMQs**). We do not begin evaluation of new suppliers until they have provided all information which is requested in the SMQs, nor are suppliers added to The Arch Company's supply chain unless and until satisfactory responses to the SMQs have been provided. The SMQs require suppliers to confirm that:

- They have taken and will continue to take appropriate and proportionate action to ensure slavery and human trafficking is not taking place in their business or their supply chains;
- They have not been convicted of any offence under the Modern Slavery Act 2015 (the **Act**); and
- They will notify The Arch Company of any breach or potential breach of the Act.

We have taken further steps to annually review our existing top 100 suppliers categorised by annual spend and sought the foregoing confirmations from each of those relevant suppliers together with copies of any relevant policies. In addition, we review on an annual basis the modern slavery statements that are published by each of those relevant suppliers (where such suppliers meet the threshold for reporting on Modern Slavery). All of The Arch Company's top 100 suppliers have satisfied the supplier evaluation process, and 97% meet the reporting thresholds under the Act and publish their own slavery and human trafficking statement.

### **Our Ongoing Commitment**

The Arch Company recognises its responsibility to ensure that its policies and systems reflect a zero tolerance of any forms of slavery, human trafficking, forced labour and child labour. The Arch Company will review its policies, processes and procedures, including staff training, to ensure that these issues remain effectively embedded in our business in accordance with the Act and best practices.

We will also continue to monitor our suppliers in the year ahead.



The statement was approved by the board of CDR JV GP Limited (the **Board**) on 14 December 2022 and signed on behalf of the Board by Adam Dakin, Director, The Arch Company.

**Adam Dakin**

On behalf of CDR JV GP Limited (on behalf of itself and CDR JV L.P) and its subsidiary entities, including but not limited to:

CDR Midco GP Limited (on behalf of itself and CDR Midco L.P.);

The Arch Company Properties Limited (on behalf of itself and The Arch Company Properties L.P.);

The Arch Company Services Limited;

CDR Nomineeco 1 Limited; and

CDR Nomineeco 2 Limited.