

## Eco World London Modern Slavery Policy

This Policy is written for and is applicable to Eco World London Development Company Limited, Eco World London Holdings Limited and any of their subsidiary and/or associated companies (“Eco World London”, “We” and “Us”).

Modern slavery is an international crime and a violation of fundamental human rights. It is a global problem that transcends age, gender and ethnicities. It may take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It permeates many aspects of the legitimate economy, including our property development sector whereby our supply chain's industry, notably the construction industry, is one of the many industries in the UK targeted by traffickers and illegal/unlicensed gangmasters.

The Modern Slavery Act 2015 (the “Act”) was introduced in the UK in October 2015 with the aim of stamping out slavery and trafficking and created a number of new criminal offences. It also increased penalties and strengthened the powers of the police and border forces. The Act also contains a number of measures intended to encourage businesses to take steps to address modern slavery. In particular, commercial organisations supplying goods or services with a total turnover of £36 million or more must now comply with disclosure requirements.

The purpose of this policy is to provide information and guidance to all persons working for Eco World London in any capacity on how we deal with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Act.

### **Our Policy Statement**

Eco World London takes a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, sub-contractors, consultants, suppliers, service providers, joint venture partners and other agents, third-party representatives and business partners, and expect our supply chain to impose the same standards on their own supply chain. We therefore require this policy to be complied with in our supply chain contracts and appointments.

### **Policy Application**

This policy applies to all persons working for Eco World London or on our behalf in any capacity and within any part of our business, including employees at all levels, directors, officers, committee members, agency workers, seconded workers, volunteers and our supply chain including all contractors, sub-contractors, consultants, suppliers, service providers, joint venture partners and any other agents, third-party representatives and business partners (together “Personnel”).

### **Compliance with this Policy**

All Personnel working directly for us must read, understand and comply in all respects with this policy. Any activity which could lead to or suggest a breach of this policy is strictly prohibited. It is the wider responsibility for all those that either work for or directly with Eco World London to help ensure the prevention, detection and immediate reporting of any possible breaches of this policy.

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All our Personnel are encouraged to raise any concerns about any issue or suspicion of modern slavery at the earliest possible stage. Eco World London encourages openness and transparency and any person that raises a genuine concern in good faith under this policy will be supported by the business, even if they turn out to be mistaken. We will investigate all genuine concerns which are raised in connection with this policy and our Personnel are encouraged to act without any fear of reprisal. If our Personnel believe or suspect that there has been a breach of this policy, or a breach may occur in the future, they must report their concerns as soon as possible either to their line manager or to our Company Secretary being [martin.hill@ecoworldinternational.com](mailto:martin.hill@ecoworldinternational.com) or by calling +44 (0) 845 600 7230.

Eco World London will do everything it can to protect the confidentiality of those raising a concern if this has been requested by its Personnel. However, Personnel are discouraged from making any disclosures anonymously, as this can limit the investigation process.

Following an internal investigation, Eco World London may decide to alert the police.

### **Safeguards**

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion they might have. If any Personnel consider that they have suffered any such treatment, then they should use Eco World London's Grievance Procedure which is available by emailing the People Team at: [PeopleTeam@ecoworldinternational.com](mailto:PeopleTeam@ecoworldinternational.com).

### **Communication and awareness of this policy**

Eco World London recognises its statutory obligations in connection with the Act and is taking appropriate steps to ensure that modern slavery does not take place within our business and our supply chains. However, we recognise that we do not control the conduct of individuals and organisations in our supply chains. We will take the following measures to ensure compliance, so far as we are reasonably able, to prevent modern slavery from occurring:

- We will communicate this policy to our Personnel focusing on the risk Eco World London's business faces from modern slavery in its supply chains.
- We will make known Eco World London's zero-tolerance approach to modern slavery and this policy to all contractors, sub-contractors, consultants, suppliers, service providers, joint venture partners and any other agents, third-party representatives and business partners at the outset of our business relationship with them and as appropriate thereafter.
- We will introduce contractual provisions for all our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- We will include in the directors' report accompanying our annual financial statements a reference to Eco World London's Modern Slavery and Human Trafficking Statement.
- As part of our commitment to this issue we are engaged in a process of ongoing due diligence which involves reviewing all existing contracts to ensure that all contractual terms are drafted and if necessary, amended to ensure compliance with Eco World London's Modern Slavery Policy.
- We will review this policy annually and update it where necessary.

## Eco World London Modern Slavery Policy

### Breaches of this Policy

Any Personnel working directly for us and found to be in breach of this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any claims or allegations made by Personnel who work directly for us which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

We may terminate our relationship with other individuals and organisations working on our behalf if they are found to be knowingly in breach of this policy having been made aware of it.

### Supply Chain and Third Party Compliance with this Policy

Those who are accessing this policy because they are either seeking to have or already have a business relationship with Eco World London are also advised to familiarise themselves with this policy and should refer any questions or comments to our Company Secretary at [martin.hill@ecoworldinternational.com](mailto:martin.hill@ecoworldinternational.com) or by calling +44 (0) 208 066 2255.

### Responsibility for this Policy

The board of Eco World London has overall responsibility for ensuring that this policy complies with its legal and ethical obligations, and that all those connected parties comply with it. Management at all levels within our business are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The People Department has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

### Comments on this Policy

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Company Secretary whose email is: [martin.hill@ecoworldinternational.com](mailto:martin.hill@ecoworldinternational.com).

Heng Leong Cheong  
CEO  
Eco World Development Company Limited

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