

Modern Slavery Policy Statement

January 2023

ABOUT THIS POLICY

SDL Property Auctions (SDL) is committed to conducting its business in a socially responsible way. It seeks to carry out their operations in accordance with appropriate ethical standards and be honest and fair in their relationships with customers and suppliers. As part of this, SDL is dedicated to ensuring that effective systems and controls are in place to safeguard against modern slavery and human trafficking occurring within our business or any of our supply chain.

SDL PROPERTY AUCTIONS SLAVERY AND HUMAN TRAFFICKING STATEMENT

In accordance with the Modern Slavery Act 2015 (“**Act**”), SDL has published this statement which sets the steps that members have taken to prevent modern slavery and human trafficking from occurring within its business and supply chains.

SDL is a leading provider of property services to its key customer groups. The service provided to consumers is real property auctions (buying and selling real property).

As at 1st January 2023, SDL employed circa 48 people across the UK, where its business operations are entirely based.

SDL Property Auctions Supply Chains

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

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

SDL Property Auctions Policies and Contractual Provisions

The approach of members of SDL to the promotion of human rights and ethical issues is contained within SDL’s 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 HR policies apply to all individuals employed or engaged by SDL. Employees can use the whistleblowing policy to report suspected concerns within the SDL business and supply chains.

Since the enactment of the Act, members of SDL have taken steps to seek to ensure that any new agreements with suppliers include an express obligation for suppliers to comply with

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the Act, to implement due diligence procedures within its own supply chains and notify SDL in the event of any actual or potential incidence of modern slavery. In the event of a breach of these provisions, members of SDL 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 Property Auctions Due Diligence

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

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

Contractors used by SDL 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 Property Auctions Areas of Risk

Overall exposure to modern slavery for members of the SDL 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 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 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 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 will consider such risks and take appropriate steps to address any emerging risks.

SDL Property Auctions Training

SDL understands the importance of training employees to enable them to be able to identify risks of modern slavery. SDL employees receive information that allows them to understand

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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

The Board 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.