

BROADLAND PROPERTIES LIMITED AND SUBSIDIARY COMPANIES

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

Structure and Supply Chain

Broadland Properties Limited Group (BPLG) is UK-based investing in farming, property trading and investment, stately home open to the public, renewable energy generation, leisure and forestry, in the UK and Poland. BPLG is committed to driving out acts of modern day slavery and human trafficking within its business and supply chain, and expects the same from suppliers and partners.

BPLG acknowledges responsibility to comply with the UK Modern Slavery Act 2015. This statement outlines the policies and procedures BPLG has in place to mitigate and manage the potential risk of modern slavery and human trafficking in its operations and supply chains.

Policies

BPLG has reviewed its policies to ensure that modern slavery and human trafficking receives increased awareness. We are taking steps to improve how BPLG tackles the risks and deals with any issues related to modern slavery and human trafficking across its business and supply chain. BPLG has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

BPLG accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications. This applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

Responsibility

The board of directors has overall responsibility for ensuring compliance with the Company's legal and ethical obligations.

Due Diligence Processes

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. If they believe or suspect a breach of or conflict has occurred or may occur, they must notify their line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy. They are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Risk Assessment

BPLG carries out risk management and compliance process. Modern slavery and human trafficking risk is included in these risk management and compliant processes, and will be managed and monitored on an ongoing basis by the Company's risk function in conjunction with other relevant business functions.

Training

Training will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases. The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Breaches of this policy

Sanctions for breach of the policy should be clearly set out and should include either: Disciplinary action or dismissal if the breach is by a member of staff. Termination of the contract if the breach is by a supplier, contractor or other business partner.

Company Structure

Broadland Properties Limited comprises of the following subsidiaries:

Baltic UK Limited	County Properties Limited	Subsidiaries in Poland are:
Broadland Energy (Donich) Limited	County Properties Group Limited	Polhoz Sp.z.o.o.
Broadland Energy (Kiachnish) Limited	County Properties (Northern) Limited	Liberum Sp.z.o.o.
Broadland Energy (Laudale) Limited	Hever Castle Limited	Zegart Farms Sp.z.o.o.
Broadland Energy (Moy) Limited	Hever Castle Golf Club Limited	Investycje Ziemskie Sp.z.o.o.
Broadland Properties Consultancy Limited	Learmonth Property Investment Company Limited	Morga Sp.z.o.o.
Broadland Properties Estates Limited	Queensway Park Data Centres Limited	Thistle Property Poland Sp.z.o.o.
Broadland Renewable Construction Limited	Rothley Temple Estates Limited	
Broadland Renewable Energy Limited	Saint David's Properties Limited	
Corlands Minerals Limited	York & District Investment Company Limited	

This statement is published on the following websites:

www.hevercastle.co.uk

www.countrycottageholiday.com

The statement is reviewed annually after the Company's financial year end of 31st December.

This statement was approved by the Board of Directors on 23rd June 2022.

 23/06/2022