

The King's Cross Group LP - Modern Slavery Statement for the financial year ending 31 March 2025

The King's Cross Group LP ("KCGLP") and its general partner, The King's Cross Group GP Limited, have a zero tolerance approach to modern slavery, both in its own business and in its supply chains. This statement has been published in accordance with the requirements of S.54(1) of the Modern Slavery Act 2015 and relates to KCGLP's financial year ending 31 March 2025.

Our business

KCGLP is the single land owner of the 67 acre King's Cross Estate in London N1C ("Estate") and has been engaged in the development of the Estate since 2008 with the objective of delivering a mixed-use development of major commercial, residential, educational, cultural and community sites. KCGLP has been involved in the full development process and therefore its role has included identification of the Estate, development of the designs, obtaining planning permissions, securing finance and project managing the construction process. As the development of the Estate nears completion, the focus will turn to asset management responsibilities and to look to continually improve the assets of the Estate. KCGLP has engaged Related Argent Limited to be the asset manager and development manager for the Estate until 8 September 2025, when The King's Cross Group Management Limited became responsible for most asset management services for KCGLP.

Our supply chains

In the context of KCGLP's expansive role at the Estate, it works with a wide range of advisors and suppliers to enable the design and development of the Site. KCGLP's supply chain is therefore naturally wide-ranging and complex and includes masterplanners, designers, architects and construction contractors. In the context of construction works, there are multiple levels of suppliers, including suppliers of materials. As is commonplace in the construction sector, our main construction contractors may use subcontractors to deliver elements of the construction works at the Site. As the development phase concludes, the risks facing KCGLP will change and reduce accordingly.

Our modern slavery risk analysis

KCGLP considers that the risk of modern slavery in its own business is low. KCGLP recognises that there are elements in its supply chain which are generally acknowledged as posing a higher risk of modern slavery, notably those suppliers and contractors operating in the construction sector. KCGLP maintains a high level of vigilance with respect to its construction related supply chain. KCGLP's current analysis, based on the modern slavery risk mitigation steps that it has put in place, is that the risk of modern slavery in its supply chain is low. We comment further on KCGLP's modern slavery risk mitigation strategy below.

Our policies

KCGLP is committed to ensuring that there is no modern slavery or human trafficking in its business or in any part of its supply chains. This commitment is reflected in KCGLP's Anti-Slavery Policy. This policy prohibits modern slavery and trafficked labour within its own business and its supply chain.

Our due diligence processes for modern slavery

KCGLP has a due diligence process which seeks to monitor modern slavery risks in its supply chains so as to mitigate this risk, consistent with its zero-tolerance approach to modern slavery.

In view of the wide ranging and complex nature of KCGLP's supply chains, KCGLP monitors its list of contractors/suppliers on an ongoing basis. The purpose of this is to ensure that KCGLP identifies and prioritises those businesses in its supply chain which it considers to be of medium and high risk of modern slavery. Given the recognised 'high risk' nature of the construction industry, KCGLP maintains a high level of vigilance with respect to the construction contractors used by KCGLP ("**Tier 1 Suppliers**") and these are KCGLP's primary focus throughout the due diligence exercise. As the Tier 1 Suppliers handle many elements of the construction process (including related purchases), KCGLP inevitably needs to rely on the Tier 1 Suppliers' respective anti-slavery policies and procedures in order to seek to ensure that modern slavery is not occurring in KCGLP's supply chain. We are pleased that the results of our due diligence reviews have demonstrated that a number of our construction contractors have extensive best practice modern slavery due diligence mechanisms in place, along with comprehensive anti-slavery policies. Several of KCGLP's Tier 1 suppliers are signatories to the GLAA Anti-Slavery Construction Protocol. Regular site visits of construction areas are undertaken by development and asset managers which are primarily designed to ensure best practice health, safety and welfare standards are provided for all personnel. As construction on the King's Cross Estate is largely completed, that will leave just one site to be developed. This will reduce the level of active monitoring of construction companies required significantly and will allow focus to switch to other suppliers, considered to be a much lower risk level.

Our contractual controls

KCGLP requires all suppliers and contractors to adhere to (and confirm compliance with) KCGLP's Anti-Slavery Policy. KCGLP's contract terms with its Tier 1 Suppliers include anti-slavery contractual commitments from those Tier 1 suppliers. A failure to honour these commitments would enable KCGLP to terminate the contract. In addition, KCGLP requires its Tier 1 suppliers to adhere to its Anti-Slavery Policy.

Further steps to prevent modern slavery in supply chains

In addition to the processes outlined above, KCGLP has taken the following steps to further prevent modern slavery in its supply chains:

- it has implemented mechanisms to ensure that it enters into commercial relationships with companies who share its values and standards (particularly with respect to ethical labour standards);
- it requires all new suppliers tendering for work with KCGLP to provide details of its policies on slavery and human trafficking and provide assurances that it does not (and nor does any entity within its own supply chain) engage in slavery or human trafficking or any associated activity; and
- it has launched an online training module on Modern Slavery risks for all relevant staff and will arrange additional awareness training for all staff and provide update training every 2 years.

Planned steps to further mitigate the risk of modern slavery in KCGLP's supply chains in the next 12 months:

As part of our zero tolerance approach to modern slavery and to ensure that we continue to reinforce our zero tolerance approach, in the next financial year (to year ending 31 March 2026), KCGLP has the following actions planned:

- it will review and revise its Anti-Slavery Policy and launch this to its Tier 1 Suppliers;
- it will review and update its Modern Slavery due diligence questionnaire and related due diligence processes and will look to implement an annual self-declaration system with respect to continued compliance with its Tier 1 Suppliers. This should have happened in the previous financial year but has been delayed due to restructuring of the Asset Manager and KCGLP operations;
- it will review and update, if necessary, the modern slavery compliance clauses in its supply contracts and ensure compliance with latest legislation and regulations;
- It will implement additional training for staff involved in 'front line' roles to ensure those staff have a greater depth of understanding of typical indicators that an individual may be the victim of modern slavery; and
- it will explore various industry initiatives aimed at eradicating modern slavery to determine whether there are any initiatives which it is appropriate for it to participate in.

Assessment of effectiveness in preventing modern slavery

KCGLP reviews and evaluates, on an ongoing basis, the effectiveness of the measures it takes to prevent modern slavery in its own business and in its supply chains. KCGLP will continue with these assessments. Factors that it takes into consideration to determine the effectiveness of the measures that it has in place include: staff training levels (including active engagement in such training); and any reported incidents of modern slavery in KCGLP's supply chain.

No instances of modern slavery have been reported to, or identified by, KCGLP during the year ending 31 March 2025.

This statement is made pursuant to S.54(1) of the Modern Slavery Act 2015 and constitutes KCGLP's slavery and human trafficking statement for the financial year ending 31 March 2025.