

# KFIM Human Rights & Modern Slavery Policy

## Our Approach

The KFIM Human Rights & Modern Slavery Policy has been laid out to make KFIM's position on the matter distinctively clear to suppliers, employees and any other stakeholders. KFIM recognises that as a business we have a responsibility to protect and support the rights of all humans that are impacted by our business activities.

KFIM is fundamentally committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. As a real estate investment manager we work to provide our clients with the highest levels of service attainable. We hold ourselves to the utmost standards of professional conduct and accept nothing less from our suppliers.

KFIM is dedicated to complying with the UK Modern Slavery Act ('the Act'), UN Universal Declaration of Human Rights, and aligning to the Ten Principles of the UN Global Compact, all eight fundamental ILO conventions, and the UN Sustainable Development Goals (SDGs). This policy should be read in conjunction with our other policies including but not limited to our Health & Safety Policy, our Supplier Code of Conduct and our Environmental Policy.

The requirements laid out in this policy and our Supplier Code of Conduct are mandatory for all suppliers and associated parties. It is the responsibility of suppliers to ensure that KFIM's Human Rights & Modern Slavery Policy is communicated to any third-parties or relevant subcontractors. Suppliers should also ensure that subcontractors are taking the appropriate measures to ensure that the requirements of this policy are in effect in their own workplace.

## Sustainable Development Goals (SDGs)

In 2015 the United Nation Member States adopted 17 SDGs to provide a blueprint for peace and prosperity for people and the planet. We believe it is important that our policies align to the SDGs where possible to ensure that we are contributing to a better future for everyone. We see our Human Rights & Modern Slavery Policy aligning to the SDGs as outlined below:



Our approach and implementation of this policy will be carried out in accordance with four SDGs as well as taking into consideration the Ten Principles of the UN Global Compact and all eight fundamental ILO conventions. The implementation of SDGs will be adopted through our business as set out below:

**Building  
together**

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## Human Rights, Forced Labour and Modern Slavery

- ◆ KFIM refuses to do business with any company that participates in forced, bonded or compulsory labour, slavery or human trafficking and any company that does not protect the human rights of their employees.
- ◆ We will seek to ensure that where possible, constructors register with the Considerate Constructors Scheme (CCS), or similar local standard outside the UK, which states constructors will commit to providing a workplace where everyone is respected, treated fairly, encouraged and supported. The health and safety of the workforce is cared for, and high standards of welfare is provided and maintained.
- ◆ We will take into consideration a supplier's reputation and previous accounts of forced or compulsory labour when awarding new contracts or renewing existing contracts.
- ◆ Suppliers are expected to ensure that all work is voluntary and ensure that each employee is provided with a contract which contains a reasonable notice period. Employees will be entitled to terminate their employment with the contact after the reasonable notice period expires.
- ◆ A supplier will not require the deposit of money or the surrender of identification documents which could be withheld upon termination of employment.
- ◆ We will offer our employees training regarding the issues surrounding Slavery, Human Rights and Ethical Practices.
- ◆ Where a case is identified, within KFIM or its suppliers, which is against the KFIM Human Rights & Modern Slavery Policy, such as but not limited to forced, bonded or compulsory labour, KFIM or the supplier will implement an improvement plan. The plan will clearly identify the conditions in which the instance arose, parties involved and how it intends to be resolved.

## Child Labour

- ◆ KFIM refuses to work with any company that exploits children in the workplace or unlawfully employs persons below the minimum working age.
- ◆ KFIM requires the supply chain to comply with, as a minimum, the ILO International Labour Standards on child labour.
- ◆ KFIM stipulates that the child's best interests should always be taken into account. This includes the protection of young workers from dangerous and hazardous environments.
- ◆ If deemed necessary, spot-checks and/or investigations should be carried out into the supplier to ensure the principles in this policy are being adhered to.

## Labour, Freedom of Association and Right to Collective Bargaining

- ◆ Our suppliers should respect the rights of the employee to join trade unions or similar representative bodies and uphold the rights of employees to collective bargaining to the extent permitted by applicable law.
- ◆ The supplier shall respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

## Anti-bribery and Corruption

- ◆ KFIM works against corruption in all forms including extortion and bribery.



## Freedom Against Prejudice and Discrimination

- ◆ KFIM believes every employee should be able to work in an environment that is free from harassment and discrimination.
- ◆ KFIM has a Whistleblowing Policy. This policy is designed to ensure that staff within KFIM can raise concerns about wrongdoing or malpractice within KFIM without fear of victimisation, subsequent discrimination, disadvantage or dismissal. This policy applies to all employees of the Company, irrespective of seniority and does not discriminate at any level. Third parties, such as consultants and contractors are also required to comply with this policy.

## Health & Safety

- ◆ KFIM strives to provide a workplace which is safe and secure to work in and prevents accidents to employees and visitors. To create this environment, we have a dedicated Health & Safety Policy.
- ◆ We expect our suppliers to provide the same safe working conditions to their employees and commit to complying with this policy.

## Working Hours and Wages

- ◆ KFIM values and respects our employees, ensuring fair wages and working hours in line with all local and international laws. KFIM upholds these values for those working within our supply chain through our Supplier Code of Conduct.
- ◆ All KFIM employees have the right to equal pay for equal work, limitation of overtime and working hours, maternity pay and holidays with pay. KFIM upholds these values for those working within our supply chain through our Supplier Code of Conduct.
- ◆ We expect all suppliers to pay their workers in accordance with national and international law. All workers should be paid the applicable minimum wage and there should be limits for overtime and working hours.

## Governance

All KFIM employees are presented with a copy of the KFIM Human Rights & Modern Slavery Policy. All employees will be expected to uphold the values contained within this policy and urged to report any suspected cases of forced, bonded or compulsory labour to their line manager.

The KFIM Executive Committee is responsible for ensuring that KFIM adhere to the statements outlined in this policy. The policy is reviewed by the KFIM Board on an annual basis to ensure it is aligned with best practices.

**Prepared:** December 2021 (Updated December 2024)  
**Signed:** Matthew McDonald  
**Position:** Chief Executive Officer  
**Review Date:** December 2025