

Global Modern Slavery and Human Trafficking Policy

Purpose

This policy sets out Knight Frank's commitment to taking pro-active and practical steps to prevent modern slavery and human trafficking from occurring in our supply chains.

Why it matters

Modern slavery affects millions of people worldwide and many companies may be unaware that practices of modern slavery are occurring in their supply chains or businesses. As a property services firm, Knight Frank has assessed that the risk of slavery or human trafficking occurring in our supply chain is low relative to other industries. Regardless of the potential risk, Knight Frank takes the matter of modern slavery very seriously and publishes annual modern slavery statements in compliance with the UK Modern Slavery Act 2015 and Australian Commonwealth and Modern Slavery Act 2018.

Scope

'Knight Frank' refers to the Knight Frank global network and/or one or more of its member firms, each of which is a separate legal entity. The Knight Frank global network comprises Knight Frank LLP, its direct subsidiaries, and internationally in over 50 territories by a network of separate and independent international entities or practices.

This policy applies to all staff employed by Knight Frank. It applies also to consultants, contractors, agency staff and suppliers in relation to their work for, or on behalf of, Knight Frank.

Failure to comply with this policy may result in disciplinary action being taken against any staff involved, or the termination of contracts within the Knight Frank global network, or with contractors, suppliers and other third parties working for Knight Frank.

The Knight Frank global network can use the Knight Frank name and resources of the network. Member firms agree to abide by certain common policies and to maintain the standards of Knight Frank.

Definitions

'Modern slavery' is defined as slavery, servitude, forced or compulsory labour, or human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain.

General Principles

Knight Frank requires compliance with all applicable modern slavery and human trafficking laws in every jurisdiction and location where we conduct business.

Adequate policies and procedures must be implemented which are intended to prevent, reduce the risk and impact of, detect and address potential incidents of modern slavery and human trafficking in Knight Frank's supply chains, and must be enforced locally. These should also help ensure compliance with relevant laws and regulation. These should seek to align with UK standards where possible, unless member firms' senior management agree otherwise and explain their rationale.

Minimum Standards

Knight Frank has zero tolerance for forced labour, involuntary labour and/or child labour. We expect that all member firms of the Knight Frank Global Network, our partners, and our suppliers provide written employment or services contracts to their employees, consultants, contractors, and agency staff in a language they can understand that clearly sets out the terms and conditions of their employment in accordance with appropriate and up-to-date employment law and regulation.

All employees, consultants, contractors, suppliers and agency workers shall be entitled to safe working conditions and reasonable limitation of working hours. No one shall face financial penalties when cancelling their employment or services contract, subject to giving reasonable notice in accordance with local law and their employment or services agreement with Knight Frank. Passports or immigration or identity documents must never be withheld.

Understanding risks or suspicious activity

It is expected that all reasonable measures are taken by Knight Frank to minimise the risk of modern slavery and human trafficking within our supply chains and to take reasonable steps to protect anyone working for, on behalf of, or with Knight Frank from such risks including by:

- Only working with suppliers who can demonstrate that they share our commitments;
- Carrying out due diligence and clear onboarding processes with existing, new and potential suppliers; and
- Reporting any suspicions through appropriate internal channels, and where it is required, to relevant regulatory and law enforcement authorities for prompt investigation.

We do this by:

- Looking out for signs of financial exploitation;
- Observing worker treatment;
- Monitoring industry and geographical risks; and
- Following the principle of doing enhanced due diligence whenever suspicions arise.

Reporting Suspicions

You must make timely reports of suspicious activity through appropriate internal channels, and, where it is required, to relevant regulatory and law enforcement authorities.

You must co-operate with any lawful requests for information made by government or law enforcement agencies. In some countries it may be an offence to inform the customer or client of such requests. You should seek advice from Office or Group management where you are unsure what must or must not be disclosed.

Whistleblowing

Knight Frank maintains a *Global Whistleblowing Policy*, incorporating an independent hotline, to ensure that KF staff, our suppliers and our clients can report concerns, confidentially where possible, and to ensure that such concerns are investigated and remediated appropriately.

In line with the *Global Whistleblowing Policy*, Management has a responsibility to investigate any reports of wrongdoing. Inaction in investigating reported or known issues will not be tolerated and will be subject to disciplinary action. There will be no repercussions for employees or associated persons taking these reporting steps.

Where there is suspicion of a modern slavery incident taking place, staff should inform the UK Best Practice team in the first instance, who will liaise with the local incident management team to determine the correct approach.

If staff feel uncomfortable reporting to the UK Best Practice Team, the Whistleblowing hotline is available to all staff.

Policy Implementation

This policy is to be adhered to by all entities within the Knight Frank Global Network. This policy will be made available to the Knight Frank Global Network via the Knight Frank website and other applicable platforms.

Monitoring and Review

This policy will be reviewed in line with all other global policies at least annually. If there is a business or legislative reason for it to be reviewed more frequently, then this will be conducted by the Procurement team.

Global Modern Slavery and Human Trafficking Policy

Prepared on: July 2025
Signed: William Beardmore-Gray
Position: Senior Partner and Chairman
Review Date: July 2026