Modern Slavery Act Statement

Statement for the Financial Year ending December 2025

This statement is made pursuant to the Modern Slavery Act 2015 ("the Act") and comprises Avison Young's slavery and human trafficking statement.

Introduction

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour, and human trafficking all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Avison Young is committed to continually reviewing and improving our practices to combat slavery and human trafficking.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

At Avison Young we expect the same high standards from all of our contractors, suppliers and other business partners and we will continue to include specific prohibitions against the use of forced, compulsory, or trafficked labour, as well as anyone held in slavery or servitude, whether adults or children, in our contracting processes, and we expect our suppliers to hold their own suppliers to the same high standards.

This statement applies to all individuals who work for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This statement relates to Avison Young's actions and activities during the financial year 1 January 2025 to 31 December 2025.

Organisational Structure and Supply Chains

Avison Young is a global business headquartered in Canada.

Avison Young is a collaborative, global firm owned and operated by its Principals. Founded in 1978, the company provides value-added, client-centric investment sales, leasing, advisory, management, financing and mortgage placement services to owners and occupiers of office, retail, industrial, multi-family and hospitality properties.

We offer the country's leading and most diverse real estate advisory service. With its in-depth understanding of the market, supported by a leading research capability, Avison Young advises private businesses and the public sector on the whole real estate lifecycle - offering clients a service that spans the entire property lifecycle from strategy and planning, through to delivery and management.

Avison Young (UK) Limited and subsidiary companies are headquartered in London and have 12 offices across the UK, employing approximately 1,200 staff.

Organisational Policies

As a responsible company, Avison Young strives to carry out business activities ethically and with integrity.

In relation to people management, the primary policies relating to ethical working are part of Avison Young's Ethics and Compliance Framework that includes, but not limited to our Code of Conduct, Supplier Code of Conduct, Complaints and Whistleblowing programs. Anyone working for or on behalf of Avison Young is expected to uphold the values of the company.

The key requirements of the codes in relation to people are:

- Counteracting illegal employment;
- Respect for the fundamental human rights of employees; and
- The ability of anyone in our supply chain, at any point, to flag concerns regarding malpractice.

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Assessing and Managing Risk

Modern slavery and human trafficking comprises a number of activities that are contrary to legal or moral conduct. We have reviewed our supply chain and established that any risks that could possibly arise would fall into two categories; Forced Labour, meaning work or service which people are forced to do against their will under threat of punishment; and debt bondage is where people borrow money they cannot repay and are required to work to pay off the debt, losing control over the conditions of both their employment and the debt. With this in mind, we have considered our supply chain and assessed the risks of finding modern slavery issues as being low, as we source from technical and professional service providers from within the UK, and mainly from the professional services sector.

Avison Young recognises that there is an element of risk within the lower skilled and paid end of services, particularly within cleaning and security service sectors. However, while this is a very small part of our overall business and generally outsourced to reputable organisations, Avison Young does consider this to be a risk, nonetheless.

Due Diligence

As a progressive employer supportive of social mobility, we pay all employees and on-site contractors at least the Real Living Wage (which is above the National Living Wage), a process that is reviewed on an annual basis. The only exception is for those employees on the Avison Young Apprenticeship programme as their wages are subject to their age and course as per the national structure for qualification. We have a range of policies, including our Grievance Policy and Whistle Blowing Policy, available to all employees to access and use in the unlikely event that this becomes necessary. All employees and new starters are made aware of their rights and our obligations under the Act and the policies that relate to this.

For third and fourth party suppliers, Avison Young makes every endeavour to use companies who are reputable and demonstrate a commitment to our values in relation to ethical working practices.

To support effective assessment of our supply chain we have strengthened due diligence questions and requirements of our supplier vetting programme, to focus on fair employment and ethical practices, supported by a supplier code of conduct that we expect all suppliers to sign up to and comply with at all times in the course of their business dealings with us.

The supplier code of conduct includes a commitment from the supplier to permitting and co-operating with any audit requirement that arises during the course of the relationship.

Training

Taking a risk based approach Avison Young provide awareness training to key personnel who are responsible for procurement of technical services within our property management, project management and facilities management areas of the business.

To ensure that the rest of our Principals, employees and workers understand the risks of modern slavery and human trafficking in our supply chains and our business, annual training and a copy of the Modern Slavery Policy are provided. This includes how to escalate any concerns via several available avenues, including to their Manager, via the Ethics Portal, or directly to the Director, Global Risk & Compliance.

Looking Ahead

We will continue to work on raising awareness of modern slavery as a human rights violation and evolve our internal processes. Our focused activities for the next reporting period include:

- Updating and delivering targeted modern slavery training to our employees and our supply partner employees, especially in our higher risk business lines and functions;
- Monitoring supply partners sign up to the Avison Young Supplier Code of Conduct and enhancements to our supplier risk assessment procedures;
- Update and evolution of our firm wide risk assessment;
- Ensuring our employees are aware of our modern slavery incident management process, ethics reporting and speak-up portal to be able to identify and escalate circumstances that may indicate modern slavery activities;
- Monitoring changes in the legislative landscape, adapting strategies and procedures to meet evolving legal standards and best practices.

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Management Commitment

Avison Young is committed to being a responsible global business and this is demonstrated through our management team's approach to all aspects of compliance and supporting a policy of continually reviewing our supply chain to identify and resolve any concerns that are found or arise.

This statement will be published on our company website (link available via the homepage), will be available for all relevant procurement portals, and will be reviewed and updated annually.

This statement has been reviewed by our UK Board and UK Operations Executive and signed on their behalf by:



George Roberts
President
Avison Young (UK) Limited