

LSL Group Modern Slavery Statement 2025

This statement is made on behalf of the LSL Group, and in particular LSL Property Services plc (LSL) and its subsidiary e.surv Limited (e.surv), which are required to make a statement pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act).

We recognise the continued existence of slavery and human trafficking in society, the significance of its impact on its victims and the wider society. We believe in the importance of organisations playing a part in eradicating it from society and we are fully supportive of the principles of the Act.

The statement sets out the relevant controls across the LSL Group and the processes in place during the financial year ending 31 December 2024 in relation to the prevention of modern slavery and human trafficking from occurring within the business and its supply chains.

About LSL

We are one of the largest providers of services to the UK property and mortgage market across a range of different, complementary areas. We seek to deliver sustainable, resilient and profitable growth through business-to-business services to mortgage intermediaries and estate agent franchisees, valuation services to lenders and home surveys direct to consumers. LSL is listed on the London Stock Exchange. The Group employs approximately 1,800 people across the UK.

We operate three Divisions:

1. Financial Services, which provides compliance and other services to members of LSL's Financial Services Network, which includes the PRIMIS Mortgage Network¹ and The Mortgage Alliance (TMA)².
2. Surveying & Valuation, which includes e.surv and also trades as Walker Fraser Steele in Scotland, provides surveying and valuation services to many of the largest lenders in the UK. The Division also includes the asset management businesses - LSL Corporate Client Department (trading name of LSL Corporate Client Services Limited) and Templeton LPA Limited, which specialise in managing the sale of residential properties on behalf of corporate clients and property investors.
3. Estate Agency Franchising, which provides services such as brand marketing and commercial and IT support to a network of franchisees over a large number of

¹ PRIMIS Mortgage Network is the trading style of First Complete Limited; Advance Mortgage Funding Limited, Personal Touch Financial Services Limited and TenetLime Limited. All of these networks are directly authorised and regulated by the Financial Conduct Authority (FCA).

² TMA is a trading style of Advance Mortgage Funding Limited.

territories across the UK. These territories are independently managed and operated by the franchisees under various brands which are not part of LSL. We also support estate agency franchisees by providing a range of services for house builders, developers and investors through LSL Land & New Homes and conveyancing panel management and support services to franchisees and their customers.

Our Supply Chain

Although our operations are based in the UK, we recognise that our supply chains may extend globally. We understand that certain parts of our supply chain, especially those involving temporary or overseas labour, may carry a higher risk of modern slavery, and we remain vigilant to these risks.

Our suppliers principally provide the following key products and services:

- Technology: external data centers, data providers, IT infrastructure, hardware providers, cyber security services, and software suppliers.
- Marketing: media advertising and research services.
- People: recruitment services, training and development services, colleague travel and accommodation.
- Professional services: advisory and consultancy services.

Our Divisions will procure such services for themselves, to the benefit of their customers or those of other LSL Group companies, including property management services and contractors.

Our Colleagues

We create employment directly for our colleagues and indirectly within our supply chains. We are committed to adhering to the UN Guiding Principles on Business and Human Rights, promoting the highest standards of integrity, personal conduct, ethics and fairness, in line with the UK regulatory environment we operate in. We protect and promote the human rights of our colleagues in the following ways:

- Undertaking pre-employment checks on all new colleagues, confirming their identity and eligibility to work in the UK.
- Providing clear and timely information to colleagues on their statutory rights, including sick pay, holiday pay and other benefits they are entitled to.
- Paying our colleagues fairly and continuing to ensure all colleagues across the Group are paid at least the Real Living Wage.
- Maintaining regular communication with our colleague community, using the Colleague Engagement Forum and regular colleague surveys.
- Regularly calculating and monitoring our gender pay gap across the Group.
- Completing annual compliance training on modern slavery.

- Making available grievance and whistleblowing channels for colleagues and ensuring whistleblower protection.

Our Commitment

We are committed to upholding the highest standards of ethical conduct and integrity throughout our operations. We maintain a strict zero-tolerance policy towards modern slavery and human trafficking. This commitment extends not only to our own business activities but also to the relationships we maintain with our suppliers and business partners.

Our values and our corporate governance framework underpin this commitment. Through our Group-wide Combined Ethics Policy, we clearly set out the behaviour and standards expected from all colleagues and those who work with us, reinforcing our dedication to human rights and ethical business practices.

Policies and Controls

We have implemented a range of policies that support our approach to tackling modern slavery and human trafficking. Our Group-wide Combined Ethics Policy outlines our approach to anti-corruption and bribery (including hospitality), anti-slavery and human trafficking, conflicts of interest, tax evasion, whistleblowing and fraud, and encourages honest and ethical conduct throughout all operations.

Supplier management protocols are in place, and we expect our supply chain to adhere to international standards on human rights, including with respect to child and forced labour, land rights and freedom of association. As part of its supplier due diligence processes, e.surv undertakes a risk assessment of each supplier, which includes consideration of their policies in relation to modern slavery and human trafficking.

Our Whistleblowing Policy ensures that colleagues, suppliers, and other stakeholders can confidentially report any concerns, including those related to modern slavery. Furthermore, our Anti-Bribery and Corruption Policy reinforces our commitment to ethical business dealings. These policies are subject to regular review to ensure they remain effective and relevant.

Training and Awareness

We recognise that raising awareness among our colleagues is critical to preventing modern slavery. During 2024, we delivered refresher training to relevant colleagues, equipping them to identify and appropriately respond to signs of modern slavery. In addition, all new colleagues receive induction training that covers our ethical standards, our stance on modern slavery, and the availability of whistleblowing channels.

Monitoring and Effectiveness

We monitor the effectiveness of our actions against modern slavery through a number of mechanisms. We conduct annual reviews of supplier compliance and non-compliance reports. The Board receives periodic updates on sustainability matters, which includes the application of the various policies in place to mitigate the risk of modern slavery.

We also monitor whistleblowing channels for any reports related to modern slavery, of which there were none recorded in 2024.

To drive greater transparency and continuous improvement, we have introduced key performance indicators which are aligned with our risk management framework and sustainability strategy, as set out in our 2024 Annual Report.

Key Performance Indicator (KPI)	2024 Performance	2025 Target
Completion of modern slavery training by relevant colleagues	100% completion for new starters and refresher training.	Maintain 100% completion for all roles.
Number of whistleblowing reports relating to modern slavery	0 reports received.	Continue monitoring and ensure all concerns are appropriately investigated.
Review and update of relevant policies	All key policies reviewed in 2024.	Complete next review cycle by 2026.

Looking Ahead

We reported in our 2023 statement that e.surv had committed to sharing areas of best practice across the Group in order to develop a supplier management policy in order to enhance the methods through which the Group conducts supplier due diligence and risk assessments. While progress has not been as advanced as we had hoped, this remains a key focus for 2025.

Approval

This Statement was approved by the Board of Directors of LSL Property Services plc on 28 May 2025. It has been prepared on behalf of LSL Property Services plc and its subsidiary e.surv Limited. It has been signed on behalf of the LSL Board by:

Adam Castleton
Group Chief Executive Officer
LSL Property Services plc
28 May 2025

This Statement replaces the last Statement which was published in June 2024.