

## **Modern Slavery Act 2015: Slavery and human trafficking statement**

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is Tritax Big Box REIT plc's slavery and human trafficking statement for the financial year ending 31 December 2018.*

### **About the Company**

Tritax Big Box REIT plc (the **Company**) is the only UK Real Estate Investment Trust dedicated to investing in and funding the pre-let development of very large logistics facilities in the UK. As at 31 December 2018, the Company's portfolio comprised 54 Big Box assets and 114 acres of prime London distribution development land, independently valued at £3.42 billion, including all forward funded development commitments.

As the Company is a UK office-based business, the majority of its internal expenditure is for third party professional services, including legal firms, financial advisers, brokers, depository services, accountancy services, marketing and PR agencies, IT support, HR services and internal office **expenditure**. In relation to the acquisition, development and forward-funding of developments, the Company engages property managers, asset managers, contractors and banks. In addition, the Company's suppliers may engage suppliers on behalf of the Company.

The Company has appointed Tritax Management LLP (the **Manager**) as alternative investment fund manager pursuant to the Alternative Investment Fund Manager Directive. The Manager is authorised by the FCA and provides all relevant management and advisory services to the Company.

Further information on Tritax Big Box REIT is available at [www.tritaxbigbox.co.uk](http://www.tritaxbigbox.co.uk). Further information on the Tritax group is available at [www.tritax.co.uk](http://www.tritax.co.uk).

References to "we" in this statement are to the Company.

### **Mission**

We are committed to maintaining the highest standards of ethical behaviour and expect the same of our business partners. The use of slavery and human trafficking is unacceptable and entirely incompatible with our ethics as a business. We believe that all efforts should be made to eliminate it from our supply chains.

We recognise that real estate and construction are sectors that are highly ranked in terms of being most prone to exploitation. However, our suppliers are third party professional services based in the United Kingdom and so we consider them to have a low risk of modern slavery and human trafficking.

This statement details the steps taken this financial year to address and combat the risks of slavery and human trafficking in the Company's business and supply chains, and the steps the Company intends to take in the next financial year.

### **Steps taken**

The Manager, on behalf of the Company, maintains internal controls and systems to manage the risk of slavery and human trafficking within the organisation and supply chains, including:

- Regular requests for formal governance information from our suppliers to enable the ongoing monitoring of the parts of our business and supply chain at risk and a due diligence and a risk assessment of new suppliers.

- We look to work with developers and contractors who comply with the Considerate Constructors Scheme. This scheme encourages best practice in relation to providing and maintaining high standards of welfare and providing a workplace where everyone is respected treated fairly, encouraged and supported.
- Further to our belief that those who report suspected incidents should be protected, the Company has implemented a whistle-blowing policy which protects those who report incidents of slavery and human trafficking from victimisation.

We have assessed the effectiveness of steps taken over this financial year. The whistle-blowing policy has only recently been implemented and we are building awareness of the policy into the training mentioned below.

### **Further steps**

The Manager will continue to review the effectiveness of the steps the Company is taking to eliminate slavery and human trafficking in the Company's business and supply chains. In particular:

- Notwithstanding the fact that the Company considers there to be a low risk of modern slavery and human trafficking within the Company's supply chains based on the steps taken by the Company at supplier engagement stage, the Company is undertaking a risk assessment process to identify key areas of the business and its supply chain at risk.
- In order to ensure the Company and Manager's staff are able to identify signs of slavery and human trafficking and be aware of what action to take if such activities are suspected, the Manager is providing its staff with training on recognising the signs of slavery and human trafficking and complying with the business's policies and procedures.
- Catherine Fry, the Manager's Head of Compliance, is taking steps to ensure that the appropriate Codes of Conduct and policies are in place and understood both within the organisation and by the Company's business partners. These codes and policies will allow the Company to enforce systems and standards to ensure that slavery and human trafficking is not present in the Company's supply chains. Adherence to such policies will be monitored by the Manager.
- As the Company is in the business of acquiring large logistics centres, typically, the tenants of these assets will be contracting with local suppliers rather than the Company itself being the contracting party. The Company will be taking steps to ensure our tenants are aware of our internal codes and policies and introduce measures to ensure that our tenants take steps to comply with these.

This work will continue in 2019.



Chairman

Tritax Big Box REIT plc