

Modern Slavery Act 2015

The Logikor Group* statement for financial year ending 31 December 2022

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps we have taken during the financial year ending 31 December 2022 to prevent modern slavery and human trafficking from taking place in our supply chain or in any part of our business.

Logikor is committed to the highest ethical standards and to practices that enhance the welfare, safety and well-being of our staff and wider communities. We respect the human rights of all those who come into contact with our operations and will work to identify and address any risks of modern slavery and human trafficking applicable to our business and supply chain.

1. Our business

Logikor owns, manages and develops logistics real estate in key transportation hubs and close to major population centres across Europe.

Our portfolio of owned and managed properties, spanning over 20 million square metres of warehouse space and 19 countries, enables us to support over 2,000 customers. Being headquartered in London and Luxembourg with over 275 people in offices across Europe we are on the ground in the right places, with local knowledge and relationships to deliver real estate solutions for our customers.

As at 31 December 2022, Logikor owns a portfolio of 594 high-quality properties with a lettable area of approximately 13.4 million square metres strategically located in key European logistics markets. We also have approximately 7.5 million square metres of additional third-party assets under management.

Our expert local teams focus on active asset management and establishing deep customer relationships, which enables Logikor to provide efficient, agile and innovative leasing solutions. Generally, our customers are responsible for operating the assets they have leased from us. Where we have direct responsibility, we appoint and work closely with high-quality local companies to support the operational management of our assets on our behalf.

Logikor continuously reviews and maintains its assets throughout their lifecycle to ensure they meet modern logistics standards and the needs of our customers. The business is committed to supporting our customers' growth plans through a combination of acquiring, developing and expanding new space.

In 2022 we completed six development projects in Romania (three), France, Poland and Finland. We have eight further projects underway in Italy (three), Poland, the Netherlands, Germany, France and the UK. Of the 14 completed and active projects, 12 are pre-leased, with minimal leasing risk for the remaining two projects due to low levels of sub-market vacancy. In line with our focus on enhancing the sustainability of our portfolio, all development projects underway are expected to be rated at least BREEAM Very Good or equivalent.

We have a wide supplier base to support our operations. It includes leasing agents; professional advisers and specialist consultants (e.g., lawyers, auditors, accountants, bankers, notaries); insurance providers; asset maintenance, refurbishment and building contractors and developers; providers of construction and office services. Our general contractors, leasing agents and property managers may engage certain suppliers on behalf of Logikor. Most of Logikor's external suppliers are focused on corporate professional and office services, as well as the management of our real estate assets. The majority of our suppliers are based in Western European countries, including UK, Luxembourg, France, Germany, Finland, Sweden, Denmark, Italy, Poland, the Netherlands, Spain, Portugal, Hungary, Romania, Czech Republic, Austria, Belgium, Slovakia, Cyprus, Guernsey and Jersey.

* This statement applies to Eurocor II S.à r.l., Eurocor III S.à r.l. and their direct and indirect subsidiaries, including Logikor Europe Limited.

2. Our guiding principles, policies and processes

At Logikor, our core values govern how we conduct our business. The values 'As One' and 'Honesty' are key pillars that support our commitment to mitigating any risk of modern slavery and human trafficking within our business and supply chain.

Our policies, together with our internal governance arrangements, seek to ensure the implementation and enforcement of effective systems and controls with regard to slavery and human trafficking, as well as any other abuses of human rights.

Logikor's Human Rights Policies within the Handbooks

Our Anti-Slavery and Human Trafficking Policy is part of our commitment to acting ethically and with integrity in all our business dealings and relationships. It forms part of our wider set of Human Rights Policies which highlight Logikor's firm commitment to upholding all human rights, as set out in the UN's Guiding Principles on Business and Human Rights. These policies are issued to all personnel on appointment as part of their local handbooks, where it is explained that we expect all individuals working for and on behalf of Logikor to act within the letter and the spirit of these manuals at all times.

Third Party Code of Conduct

As a leading owner, manager and developer of modern logistics and distribution properties in Europe, Logikor has an important role to play in embedding ethical practices and promoting responsible businesses whose values are aligned with ours.

In 2022 we updated our Third Party Code of Conduct which sets out the minimum standards of integrity and business conduct we expect of the third parties we do business with, including suppliers at all levels of our supply chain. We expect them to share our commitment to adopting a fair, socially responsible and ethical approach to business, and to require the same level of compliance and integrity from their staff and supply chain participants.

Our Code covers the following areas, amongst others: human rights, modern slavery and human trafficking, wages and hours of work, child labour, equal opportunities, diversity and inclusion, freedom of association, as well as occupational health, safety and wellbeing. It encourages all third parties to report in good faith any wrongdoing in connection with Logikor's business to our General Counsel. Additionally, any stakeholder can report their concerns on anonymous basis via the SafeCall channel accessible on the Logikor's Corporate Sustainability webpage (see the section on whistleblowing below).

Our Third Party Code of Conduct is accessible to all via our website [here](#).

Procurement and Contracts Policies

Our Procurement and Contracts Policy aims to ensure that our suppliers are competent, legally compliant, socially responsible and appropriate for the work they are being instructed on. It has been updated in 2022 to enhance our supplier evaluation, monitoring and feedback procedures and processes. Additionally, in line with the commitments expressed in the previous Modern Slavery Statement, we have extended along our supply chain to introduce a new policy to be followed by our tier 1 suppliers who may procure services for or on behalf of Logikor.

According to these policies, certain checks must be carried out prior to concluding contracts with new suppliers, irrespective of their risk profile. They also cover aspects of due diligence which may vary depending on the service being procured. Where appropriate, these due diligence processes can be followed with our existing higher risk suppliers when their contracts come up for renewal. Where services involve manual labour, enhanced due diligence processes and specific contractual provisions have been introduced to ensure that the risk of modern slavery and human trafficking in Logikor's supply chain is appropriately assessed and managed.

Logikor's procurement policies reinforce the importance of ongoing monitoring of our key supplier relationships to ensure that our service providers continue to adhere to the standards set out in our

Third Party Code of Conduct. If any adverse changes have been identified, we aim to collaborate with the relevant supplier in order to bring the underperforming areas in compliance with Logikor's standards.

Whistleblowing and internal reporting channels

We are committed to operating our business with integrity and to promoting ethical practices within our supply chain. Each individual working for or on behalf of Logikor has an important role to play in maintaining the highest standards of honesty, openness, and accountability within the Logikor Group.

Logikor has partnered with Safecall, an independent professional channel for reporting of any concerns relating to wrongdoing or health and safety. It is available to all staff and any external stakeholders via our [Corporate Responsibility](#) webpage. A report can be made in any language, on a named, anonymous or semi-anonymous basis, either online (www.safecall.co.uk/report) or via Safecall's international freephone hotline number (+44 191 516 7749). The service is available at any time and on any day. Safecall will notify the General Counsel, the CFO or the CEO, as appropriate, of any reports, based on the nature of the concern and those potentially involved.

Additionally, Logikor operates an internal How to Raise a Concern Policy which encourages all members of staff to proactively raise any issues they come across and report any wrongdoing, including violations of our human rights policies, through a choice of internal channels.

Any reports received will be fully investigated and appropriate remedial actions taken. Anyone who raises a genuine concern will be supported by Logikor and will not be subject to retaliation or suffer any detrimental treatment, even if they turn out to be mistaken. Any breaches of our human rights policies by staff will be dealt with in accordance with our disciplinary procedure. Serious cases could result in dismissal for misconduct or gross misconduct. Should a third party working on Logikor's behalf be in breach of these standards, we will take such action as we consider appropriate which may include terminating our relationship with them.

3. Internal employment practices

Logikor directly employs over 275 employees. We are headquartered in London and Luxembourg with over 53% of our employees being based in these locations. Over 90% of our employees occupy positions in which higher education or professional qualifications are typically held.

Our dedicated human resources team fully supports Logikor's employees. We regularly host activities and make available to staff a range of well-being resources, including external online wellbeing platforms, tools, communication channels and employee assistance hotlines. The team regularly reviews and monitors employee-related metrics by, *inter alia*, conducting surveys and assessments to gather feedback, monitoring the take-up of health and wellbeing resources, and understanding the learning and development requirements of staff and their areas of interest.

We take steps to raise awareness and educate employees about modern slavery and human trafficking, and the responsibilities of the business and its senior managers under the Modern Slavery Act. The topics of modern slavery, human rights and ways in which employees can report any concerns are covered with all personnel during their introduction to the business. We will continue to extend such education and awareness, with a focus on staff involved with engaging or managing higher risk suppliers.

As a responsible employer, we always strive to improve the working environment for our staff, from the quality of office space, furniture and equipment we provide to the health and well-being benefits we make available. In 2022, we repeated our all-employee engagement survey in partnership with Great Place to Work with 85% of respondents regarding Logikor as a great place to work. We received Great Place to Work certifications in 7 out of 8 eligible countries. We will continue to enhance our workplace environment and culture based on the feedback received as part of the survey.

We consider the risk of modern slavery and human trafficking within our business to be low and undertake internal assessments to evaluate its robustness in this respect from time to time.

4. Our supply chain

Our suppliers vary in terms of their size, geography and areas of expertise. Many of them are reliant on their own supply chain, potentially across many countries, in supplying their goods and services.

The majority of our suppliers are providers of corporate professional services and/or are located in Western European countries (see “*Our Business*” section of this Statement for further details). As such, we consider these suppliers to have a low risk of modern slavery and human trafficking.

We regularly refurbish, extend and develop our properties where we believe this will fundamentally reposition the asset, increase its value and/or improve the long-term energy efficiency of the asset. We therefore have a group of suppliers specialised in building maintenance, construction and development services - activities which involve manual labour. This group of suppliers is generally regarded as presenting a higher risk of modern slavery.

Please refer to section 5 below to learn about the actions we take to address and mitigate this risk.

5. Due diligence processes

Having carried out an inherent risk assessment of our suppliers by category, we found that the risk of modern slavery for Logikor is contained predominantly within the following categories of suppliers: general contractors on development projects, building contractors, their respective subcontractors and the associated procurement of materials by these third-party suppliers. Where appropriate, these suppliers are subject to enhanced due diligence when it comes to their human rights practices to enable us to assess the risks associated with them in greater detail and to address any significant gaps.

In accordance with our Procurement and Contracts Policies, certain checks must be carried out on all new vendors prior to their engagement. For example, Logikor conducts screening diligence checks on all third parties we are involved with to identify any adverse publicity associated with them and whether they are subject to any sanctions. All such parties are then continuously monitored by the system for as long as their business relationship with Logikor persists.

There are aspects of our due diligence process that can vary depending on the type of service being procured and the inherent risks associated with it. As most of our suppliers are based outside the UK, they may not have an anti-modern slavery policy in place. In such instances we query their processes, procedures, contractual practices and supply chain management techniques to satisfy ourselves that the issue of modern slavery is being monitored.

6. Risk assessment and management

At Logikor, we continuously assess any potential risks of modern slavery and the associated vulnerabilities within our business and supply chain as these can change over time. We provide appropriate training and support to relevant members of staff to raise their awareness of modern slavery and to foster a culture of vigilance.

In the event that Logikor’s senior management becomes aware of any concerns relating to modern slavery or human trafficking within our business or any supply chain, appropriate steps will be taken to investigate the issue. If we consider the steps being taken by our supplier to be inadequate in mitigating the risk of modern slavery, we will engage with a view to helping them understand and achieve the required standards. Where a supplier is found to be subject to sanctions or had a previous incidence of modern slavery or human trafficking, we will consider the steps taken by them to prevent a re-occurrence. In certain cases, Logikor may assess whether any additional steps are required, including an appointment of an independent auditor to conduct a formal investigation, designating a member of the senior management team to take responsibility for the investigation and corrective actions, such as working with the relevant supplier with a view to improving their practices in this regard.

Compliance with Logikor’s policies and procedures that are in place to support the objectives of the Modern Slavery Act is monitored for effectiveness and reported to the senior management team.


7. Looking ahead

In 2022, we updated our key third party-facing policies which include our procedures and processes for addressing the risks of modern slavery and human trafficking in our supply chain. In 2023, we will deliver supplier engagement training to the business and continue to monitor the effectiveness of the steps we take to mitigate these risks.

We will continue to work with our suppliers to raise their awareness of modern slavery and to embed positive behaviours. Where appropriate, we will communicate with existing suppliers that are considered higher risk, whether due to the services they offer and/or their location, to understand the steps they have taken or are taking to reduce the risk of modern slavery and human trafficking in their businesses, and to obtain appropriate reassurance that the policies and procedures they have adopted are sufficiently robust to meet our standards in this regard.

We will remain vigilant, monitor our business and supply chain on an ongoing basis to assess our current measures and, where needed, develop supplementary processes to reduce further any risk of modern slavery or human trafficking.

This statement has been approved by the Boards of Directors of Eurocor II S.à r.l. and Eurocor III S.à r.l. on 2 June 2023.


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Diana-Elena Dumitru

Class B Manager for and on behalf of

Eurocor II S.à r.l.

Date: 2 June 2023

DocuSigned by:

33468D571AFD41D...

Diana-Elena Dumitru

Class B Manager for and on behalf of

Eurocor III S.à r.l.

Date: 2 June 2023

Eleni Samara

Class D Manager for and on behalf of

Eurocor III S.à r.l.

Date: 2 June 2023

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Diana-Elena Dumitru

Class B Manager for and on behalf of

Eurocor II S.à r.l.

Date: 2 June 2023

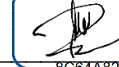
Diana-Elena Dumitru

Class B Manager for and on behalf of

Eurocor III S.à r.l.

Date: 2 June 2023

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Eleni Samara

Class D Manager for and on behalf of

Eurocor III S.à r.l.

Date: 2 June 2023