## **Modern Slavery Act 2015**

### The Logicor Group\* statement for financial year ending 31 December 2018

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 2018 to prevent modern slavery and human trafficking from taking place in our supply chains or in any part of our business.

Logicor is committed to respecting the human rights of all those who come into contact with our operations and to identifying and addressing any risks of modern slavery and human trafficking applicable to our business and supply chains.

### About Logicor

We are the largest direct owner of European logistics properties. Our 13.6 million sq m portfolio is operated through our head office in London and a network of 15 regional offices. Logicor directly employs approximately 180 people.

Logicor operates a wide supplier base, including leasing agents; professional advisers and specialist consultants; insurance providers; asset maintenance, refurbishment and building contractors; providers of construction and office services. Our leasing and property management agents may engage certain suppliers on behalf of Logicor. Most of Logicor's external suppliers are focused on corporate professional and office services, as well as the management of our c. 620 real estate assets.

# Our Policies and Guiding Principles

At Logicor, our five core values govern how we conduct the 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 chains.

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 our 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 members of our staff as part of their local staff handbooks on their appointment, where it is explained that Logicor expects all staff to act within the letter and the spirit of these manuals at all times.

Logicor also operates a 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 presented within this policy. Any such reports will be fully investigated and appropriate remedial actions taken. Anyone who raises a genuine concern will be supported by Logicor 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 will be dealt with in accordance with our Disciplinary Procedure. Serious cases could result in dismissal of a member of staff for misconduct or gross misconduct.

Logicor has a central Human Resources function that provides comprehensive ongoing support to our business and employees in this and other respects. The topics of modern slavery, human rights and ways in which employees can report any concerns are covered with all new employees during their induction to the business.

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.

<sup>\*</sup> This statement applies to Eurocor II S.à r.l., Eurocor III S.à r.l. and their subsidiaries, including Logicor Europe Limited.

#### Internal Employment Practices

Logicor has a limited number of employees, over 80% of whom occupy positions in which higher education or professional qualifications are typically held. A third of our staff are located in the UK. We consider the risk of modern slavery and human trafficking within our business to be low and have undertaken an internal assessment to consider its robustness in this regard.

### External Suppliers

Our suppliers vary in terms of their size and expertise and many will themselves be reliant on their own supply chains, 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. As such, we consider these suppliers to have a low risk of modern slavery and human trafficking.

We have a group of suppliers relating to building maintenance and construction services, activities which involve manual labour. We regularly refurbish and extend our properties where we believe this will fundamentally reposition the asset and increase its value. A larger scale development programme may be pursued in the future. We consider that the suppliers with whom we engage in these business activities represent a higher risk of modern slavery.

#### Compliance

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. We will continue to extend such education and awareness, with a focus on staff involved with engaging or managing higher risk suppliers.

Background diligence checks are being performed to identify any adverse publicity associated with these suppliers and whether they are subject to any sanctions. Where steps being taken by suppliers are believed to be inadequate in mitigating the risk of modern slavery and human trafficking, we will work with that supplier to help 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.

Logicor also has a formal procurement and contracts policy which applies across the business and requires certain relevant checks to be carried out prior to entering into any contracts with new suppliers, whether they are considered high or low risk. Such checks may include review of the new supplier's modern slavery and human trafficking policies, provisions and processes to ensure that Logicor works with third parties that share our values. This policy has been shared with the relevant external agents and service providers (such as property managers) who may instruct third parties on Logicor's behalf to ensure that such due diligence is also performed by them. The same principles are extended to existing suppliers as and when contracts come up for renewal. Where relevant, we include statements in our contracts with third parties which, *inter alia*, deal with their compliance with the Modern Slavery Act 2015 and/or the applicable local legislation.

Compliance with Logicor'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 on a regular basis.

# Next Steps

During FY2019, Logicor expects to review the procurement and contracts policy which will include an assessment of how effective the policy has been in mitigating the risk of modern slavery and human trafficking in our supply chains. We will also be working on implementing further policies and procedures in relation to our suppliers which will include aspects to mitigate the risk of modern slavery and human trafficking, particularly in relation to suppliers providing building maintenance and construction services.

We will continue to communicate with existing suppliers that are considered higher risk, whether due to

#### construction services.

We will continue to communicate with existing suppliers that are considered higher risk, whether due to the services they offer and/or their location, to understand more about 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 expectations in this regard.

In the event that Logicor'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. Such steps may include the appointment of independent auditors to conduct a formal investigation, the appointment of a member of the senior management team to take responsibility for the investigation and corrective actions such as suspension of an ongoing contractual relationship.

We are committed to remaining vigilant, monitoring our business and supply chains on an ongoing basis to assess our current measures and, where a requirement exists, to develop further processes that will reduce further the risk of modern slavery and human trafficking taking place.

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 April 2019.

Eurocor II S.à r.l.

Name: An-An Shong Title: Class B Manager

Date: 2 April 2019

Eurocor III S.à r.l.

Name: An-An Shong

Title: Class B Manager

Date: 2 April 2019

Name:

Title: Class D Manager Date: 2 April 2019

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Eurocor II S.à r.l.

Name: An-An Shong Title: Class B Manager Date: 2 April 2019

Eurocor III S.à r.l.

Name: An-An Shong Title: Class B Manager Date: 2 April 2019 Name: Ilya Kanevskiy Title: Class D Manager Date: 2 April 2019