Modern Slavery Act 2015

The Logicor Group* statement for financial year ending 31 December 2020

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 2020 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 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 chains.

Our Business

Logicor is a leading pan-European logistics company with a diversified portfolio and wide customer base. We own, manage and develop high-quality logistics assets across Europe, addressing the real estate needs of international and local distributors, retailers and manufacturers.

The Logicor Group directly employs over 200 people. We are headquartered in London and Luxembourg and have a network of 17 offices across Europe.

As at 31 December 2020, we own a portfolio of 606 high-quality properties with a lettable area of approximately 13.6 million square metres strategically located in key European logistics markets and have approximately 5.5 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 Logicor 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.

Logicor 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 selective development activity where we can best support our customers' growth plans. In 2020 we completed nine development projects, five in Germany, two in Italy, one in Finland and one in France at a total project cost of €94 million. Logicor is committed to very strong sustainability standards across all of our developments whilst working alongside equally committed suppliers.

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 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 real estate assets. 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.

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

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

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

In 2020 we issued 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 our suppliers and their supply chains. We expect our third parties to require the same level of compliance and integrity from their staff and anyone outside of their organisation engaged to provide services for, on behalf of or with Logicor. Section 3 of the Code covers the Hiring and Employment Practices, including aspects relating to modern slavery and human trafficking, wages and hours of work, child labour and freedom of association. The Code is available from our website and can be accessed by clicking here.

Logicor 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. Where and to the extent permitted, in certain jurisdictions where we have a presence, we also operate an anonymous reporting channel. Any reports received 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. Should a third party working on Logicor's behalf be in breach of these standards, we will take such action as we consider appropriate which may include terminating our relationship with the third party.

Furthermore, our Third Party Code of Conduct contains a section titled "Speaking Up" where third parties are encouraged to report in good faith any concerns in connection with any aspect of Logicor's business, including any potential breach of the Code or any applicable laws, regulations, professional and ethical standards. Contact details of Logicor's General Counsel are provided for such purposes.

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.

Internal Employment Practices

The Logicor Group directly employs over 200 people. We are headquartered in London and Luxembourg with over 55% 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 delivers a range of services, tools and communication channels to manage and support every employee. We carry out surveys on the health and wellbeing of our employees and have programmes in place to act on the findings. As a responsible employer, we continually strive to improve the working environment, from the quality of office space, furniture and equipment we provide to the health, wellbeing and fitness benefits we make available.

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 new employees during their induction 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.

In response to the COVID-19 pandemic, governments have imposed lockdowns and restrictions on travel, amongst other measures. Economies across Europe were impacted in different ways, causing considerable disruption across many sectors. The structural changes to everyday life have impacted how people live and work, making the health, safety and wellbeing of our employees a key focus for our business.

We activated our business continuity plans, enabling our people to work from home with access to all

relevant systems to ensure minimum disruption, and set up additional communications channels and means of support for our teams.

We continued to focus on the physical and mental wellbeing of our employees and undertook an all-staff survey with Great Place to Work. 90% of employees participated. The results of the survey were very positive and 83% of participating employees regarded Logicor as a great place to work. Furthermore, we put a program in place to continue enhancing our workplace environment and culture based on the feedback received.

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 (see "Our Business" section on page 1 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 and extend 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 (see "Our Business" section on page 1 of this Statement for further details). We therefore have a group of suppliers relating to 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. However, we consider that the actual risk to Logicor is relatively lower in view of the low volume of projects and the countries in which they are performed being lower risk. Please see the Due Diligence section below for actions we take to address these risks.

Due Diligence

The risk of modern slavery for the Logicor Group arises predominantly in the following areas: building and development contractors, their subcontractors and the associated procurement of raw materials by these third party suppliers.

Logicor has a 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.

In addition, all third parties with which the Logicor Group does business have access to our Third Party Code of Conduct available from our website here. Section 3 of this Code contains summaries of our policies and commitments relating to modern slavery and human trafficking, wages and hours of work, child labour, freedom of association, and health and safety. Section 6 encourages all third parties to report in good faith any wrongdoing in connection with any aspect of Logicor's business to our General Counsel and provides the relevant contact details.

Furthermore, Logicor conducts screening diligence checks on all third parties we do business with to identify any adverse publicity associated with them and whether they are subject to any sanctions. All such third parties are then subject to continuous monitoring by the system for as long as our business

relationship persists.

Where Logicor believes that the steps being taken by our supplier are inadequate in mitigating the risk of modern slavery and human trafficking, we will engage with the relevant 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.

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.

Next Steps

During FY2021, Logicor expects to conduct an internal risk assessment focused on our third party building and development contractors and their subcontractors with a view to assess the effectiveness of the steps we take to mitigate the risks of modern slavery and human trafficking in our supply chains. We will also consider how to make any continuing improvements to these practices and implement any desirable changes.

We are committed to working with our suppliers to raise awareness of modern slavery and embed positive behaviours. 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 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 working with the relevant supplier with a view to improving their practices in this regard.

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 28 May 2021.



Julien Bailly

Class B Manager for and on behalf of

Eurocor II S.à r.l. Date: 28 May 2021



Julien Bailly

Class B Manager for and on behalf of **Eurocor III S.à r.l.**

Date: 28 May 2021

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Ilya Kanevskiy

Class D Manager for and on behalf of

Eurocor III S.à r.I. Date: 28 May 2021