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 EuroBox plc’s slavery and human trafficking statement for the financial year ending 30 September 2021.

About the Company

Tritax EuroBox plc (the Company) invests and manages a diversified portfolio of well-located Continental European logistics real estate assets that are expected to deliver an attractive capital return and secure income to shareholders. These assets fulfil key roles in the logistics and distribution supply-chain focused on the most established logistics markets and on the major population centres across core Continental European countries. As at 30 September 2021, the Company’s portfolio comprised 15 assets, independently valued at €1,282.6 million, including all forward funded development commitments.

The Company has appointed Tritax Management LLP (the “Manager” and/or “TMLLP”) 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. The Manager has, on behalf of the Company, assembled a full-service European logistics asset management capability including specialist “on the ground” asset and property managers. The appointed asset managers Logistics Capital Partners and Dietz AG both specialise in the Continental European logistics sector.

As the Company is a UK office-based business managed by the Manager, the Company itself has no employees. The majority of the Company’s 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 services such as furniture and equipment.

In relation to the acquisition, development and forward-funding of sites, the Company engages property managers, asset managers, contractors and banks. In addition, the Company’s suppliers and asset managers, referred to above, may engage suppliers on behalf of the Company.

Further information on Tritax EuroBox plc is available at https://www.tritaxeurobox.co.uk. Further information on the Tritax group is available at www.tritaxeurobox.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 business and supply chains. This statement details the steps taken this financial year to address and combat the risks of slavery and human trafficking 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. As our suppliers and asset managers are experienced, third party professional suppliers which are well-established in the continent, we consider them to have a low risk of modern slavery and human trafficking. However, in-line with the Company’s zero-tolerance approach to modern slavery, the following measures have been implemented:
• The Manager’s Head of Compliance has been appointed as the Company’s modern slavery champion.

• 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 has provided certain members of staff with training on recognising the signs of slavery and human trafficking and complying with the business’s policies and procedures.

• 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.

• Inclusion of contractual obligations in new service contracts which require the service provider to comply with modern slavery legislation and the Company’s policies. This includes a requirement to notify Tritax of the remedial action that has been taken with timescales for resolution and provide updates as the resolution progresses.

• 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.

Policies and compliance

The Board and the Manager 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 and service providers. These codes and policies 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 is monitored by the Manager. These policies support our commitment to acting ethically and with integrity throughout the business, some of which are listed below:

• Supplier’s Code of Conduct Policy (new for 2021)
• Human Rights Policy (new for 2021)
• TMLLP Code of Conduct Policy
• Whistleblowing Policy
• Anti-Bribery Policy
• Tax evasion Policy
• Outsourcing Policy

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:

• The Manager will continue to provide training to specific members of staff in 2022.

• Notwithstanding the fact that the Company considers there to be a low risk of modern slavery and human trafficking within the Company’ 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.

• The Manager’s Head of Compliance will continue 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 and service providers.

• 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.

- We will continue to actively work with partners who share our values, such as with the Mission to Seafarers charity who has a branch dedicated to tackling modern slavery in sea freight.

The Company is not aware of any incidences of modern slavery within its supply chain. This work will continue in 2022.

Tritax EuroBox plc
Chairman