

## **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 2022. **This statement was approved by the Company's Board of Directors on 28 November 2022.***

### **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 2022, the Company's portfolio comprised 28 assets, independently valued at €1,772,521 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, including Logistics Capital Partners, Dietz AG, ANCAPCO Management AB, Verdion AB and CBRE Real Estate Property Management.

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 [www.tritaxeurobox.co.uk/](http://www.tritaxeurobox.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 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 modern slavery and human trafficking within the organisation and supply chains. As our suppliers, including the asset and property 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 Risk & 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.
- As part of our contract procurement, our tender pack requests details on a Supplier's Modern Slavery policy. This is reviewed as part of our assessment and awarding of the contract.
- 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, including requests for further information relating to their internal modern slavery policies and procedures.
- 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.
- Our Manager, Property Manager and Asset Managers undertake on-site inspections which enable us to check supplier practices, and this is recorded in the inspection proforma.
- 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.
- The Manager is a Goldleaf Member of the UK GBC.

### **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**

The Manager's Supplier Code of Conduct ("Supplier Code") sets out the principles and standards that we expect from our suppliers and other business partners working on behalf of the Manager and the Company, including with respect to corporate responsibility, business conduct, discrimination and modern slavery and human rights. The Supplier Code also sets out reporting and monitoring requirements.

#### **Human Rights Policy**

The Manager's Human Rights Policy sets out our expectations on employees and suppliers to act in accordance with the UN Guiding Principles on business and Human Rights, the UN Global Compact, and the international standards set out by the eight core International Labour Organisation conventions and recommendations.

### **TMLLP Code of Conduct Policy**

TMLLP's Code of Conduct (Code) sets out the Manager's expectations from its employees and business partners in relation to creating, building and maintaining trust and its long-term commitment to high legal, ethical and moral standards throughout the business. This includes a 'zero-tolerance' approach to acts of bribery or corruption, as well as acts of modern slavery in our supply chain.

### **Whistleblowing Policy**

Our Whistleblowing Policy includes the roles, responsibilities and reporting process for our employees and other workers. It includes the process and contact details should someone wish to whistleblow, including details of how to receive confidential, independent advice. This policy is also made available to our suppliers and associates who can submit details of any concerns through an independent, dedicated telephone line.

Other policies include:

- Environmental Policy Statement
- Equality, Diversity and Inclusion Policy
- Outsourcing Policy
- Anti-Bribery Policy
- Tax evasion Policy

### **Our Suppliers**

Our Suppliers are required to adhere to Tritax's Supplier Code of Conduct Policy, as well as its Anti-Modern Slavery Standards. Suppliers are obliged to alert TM LLP of any breaches in terms of the Standards and Modern Slavery Act 2015 that are relevant to the business. In relation to any breaches, the Supplier must notify TM LLP of any remedial action that is being taken with timescales for resolution and provide updates as the resolution progresses. Should a Supplier not cooperate, TM LLP will escalate the issue internally and an assessment of termination of contract will be made on a case-by-case basis. We expect Suppliers to ensure their employees understand their employment conditions and give employees fair and reasonable pay as well as any legally entitled or agreed benefits. We encourage Suppliers to pay at least the Living Wage in the region and adopt prompt payment for its subcontractors.

We have a Whistleblowing Policy in place to ensure that our suppliers and associates know who to contact should they suspect any form of qualifying disclosures, as defined by the Public Interest Disclosure Act 1998. Suppliers and associates are encouraged to speak out and will be protected from detriment or criticism if a disclosure is made in good faith. Suppliers can submit details of their concerns through an independent, dedicated telephone line, which is stated in the Whistleblowing Policy.

### **Risk assessment and management**

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, we have identified areas and processes to enhance, alongside our supply chain, and a risk-based approach is under development. This includes identifying and reviewing suppliers that fall within industries and/or locations that can carry higher risk in respect of modern slavery and trafficking. We are developing measures to assist in the review and management of these risks, including enhanced supplier take-on and on-going monitoring processes.

## **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 2023.
- 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.
- The Manager's Head of Risk & 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.
- We will continue to work with our directly appointed supply chain to develop and improve processes and understanding around modern slavery and trafficking risks and reporting, including the addition of standard clauses within our supplier agreements.
- 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 2023.

**Robert Orr**  
Chairman  
**Tritax EuroBox plc**