

Telereal Trillium Group Slavery and Human Trafficking Statement

This statement is being made by Telereal (LW) Holdings Limited on behalf of itself and its subsidiaries, and the subsidiaries of Tele-Finance Holdings Limited (a company registered in the British Virgin Islands) which are operating and established in the United Kingdom (together **Telereal Trillium** or the **Group**).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2019.

About Telereal Trillium

Telereal Trillium is the largest privately owned property company in the UK, operating in property partnerships, investment, development and strategic land, with a presence in every city and major town in the UK. We have an established £8billion UK wide portfolio of 12,000 properties with over 10,000 homes in the pipeline for development.

The Group has over 200 office-based employees in London, Leeds, and other UK regions.

Our Policies

Telereal Trillium is committed to ensuring that no modern slavery occurs in our supply chain or any part of our business and our approach is enshrined within the Group's Slavery and Human Trafficking Policy dated (the **Policy**). The Policy is applicable to all persons working for the Group or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. Training is made available on request.

Our Slavery and Human Trafficking Policy, along with our Sustainable Procurement Policy, Corporate Social Responsibility Policy, Anti-Bribery and Corruption and Whistle-blowing policies reflect our ongoing commitment to acting ethically and with integrity across our business.

Our Supply Chain

The Group has a relationship with over 900 suppliers, the major suppliers being professional advisors, property agents and businesses within the property industry, the majority of which are based and operate in the United Kingdom.

As a procurer, it is our responsibility to ensure that our supply chain maintains the high standards that we set for ourselves and that our clients rightly expect. We are committed to ensuring that there

is no modern slavery or human trafficking in our supply chains or in any part of our business. We demonstrate this commitment by acting ethically and with integrity in all our business relationships, and by implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We seek to ensure we engage only with reputable suppliers that have robust onboarding procedures with regard to people they employ. We have major supplier contracts with large and reputable companies that provide services to us nationwide in areas such as cleaning, security, maintenance and portage, each of which could be deemed a modern slavery risk.

Supplier diversity is also important to us and since 2012 we have continued to engage with, and support of small, medium-sized and social enterprises. In March 2015 we were honoured to receive the 'We Buy Social' accreditation from Social Enterprise UK acknowledging Telereal Trillium's commitment to socially responsible procurement. In addition, we were shortlisted as a finalist in the Lord Mayor's Dragon Awards in June 2015, for Telereal Trillium's sustainable procurement programme - supporting the Third Sector and supplier diversity.

We have long-term relationships with our major suppliers, which allows us to gain a thorough understanding of their capabilities and in turn, our suppliers become more adaptable to the needs of our customers. The long-term nature of our relationships gives our suppliers confidence that any investment in innovation or best practice will be recouped during the relationship.

Supply Chain Evaluation and Risk Assessment

The board of the UK group take responsibility and accountability for this statement as well as the strict provisions relevant to any suppliers that provide services to Telereal Trillium. All new suppliers must be verified by either the group finance director or his delegate in addition to a compulsory supplier evaluation process undertaken by the group's supply chain team.

We evaluate each supplier on the basis of responses to Supplier Management Questionnaires (**SMQs**). We do not begin evaluation of new suppliers until they have provided all information which is requested in the SMQs, nor are suppliers added to Telereal Trillium's supply chain unless and until satisfactory responses to the SMQs have been provided. The SMQs require suppliers to confirm that:

- That they have taken and will continue to take appropriate and proportionate action to ensure slavery and human trafficking is not taking place in their business or their supply chains;
- That they have not been convicted of any offence under the Modern Slavery Act 2015 (the **Act**); and


- That they will notify the group of any breach or potential breach of the Act.

We have taken further steps to annually review our existing top 100 suppliers categorised by annual spend and sought the foregoing confirmations from each of those relevant suppliers together with copies of any relevant policies. In addition, we review on an annual basis the modern slavery statements that are published by each of those relevant suppliers (where available). As at the date of this statement, 56% (2018: 38%) of Telereal Trillium's top 100 suppliers have published a slavery and human trafficking statement.

We will continue to review our processes and monitor our suppliers in the year ahead.

This statement is made pursuant to section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2019.

The statement was approved the board of Telereal (LW) Holdings Limited (the **Board**) on 26 September 2019 and signed on behalf of the Board by Russell Gurnhill, Chief Executive Officer, Telereal Trillium Group.



Director and Chief Executive Officer

On behalf of Telereal (LW) Holdings Limited and its subsidiaries, and the subsidiaries of Tele-Finance Holdings Limited operating and established in the United Kingdom, including but not limited to:

Telereal Services Limited;
Trillium (PRIME) Limited;
Trillium (PRIME) Property GP Limited;
Trillium Holdings Limited;
Trillium Property Services (PRIME) Limited;
LIH Financing Limited;
Empire LIH Limited; and
London Wall Outsourcing Limited.