

## MODERN SLAVERY ACT 2015 TRANSPARENCY STATEMENT

This modern slavery and human trafficking statement is made by St. Modwen Properties PLC on behalf of the companies within its group, including St. Modwen Developments Limited (Company number 00892832) and St. Modwen Homes Limited (Company number 09095920) ("**St. Modwen**") pursuant to section 54 of the Modern Slavery Act 2015 (the "**Act**") and covers the financial year ended 30 November 2018 (the "**2018 financial year**").

St. Modwen has a zero tolerance attitude towards modern slavery and human trafficking in all its business activities and supply chains. We are committed to the prevention of modern slavery and human trafficking in all its forms – 'doing the right thing,' acting with integrity, honesty and respect is a fundamental part of our culture and values as an organisation. We fully support the implementation of the Act and have and will continue to take our responsibilities under the Act seriously.

This is our third annual statement that describes the steps that St. Modwen has taken towards seeking to ensure that modern slavery and human trafficking is not taking place in any part of our business or supply chains.

### Our Business and Supply Chains

St. Modwen is a FTSE 250 company, with over 30 years' experience and a national portfolio of £1.4bn. Working across the full industry spectrum, we add value by managing schemes through the planning process, remediating brownfield land and active asset management and development. Our business focus is centred on three main strategic objectives:

- Build a high quality industrial and logistics business;
- Grow our residential and housebuilding business;
- Leverage our regeneration reputation.

Our commercial real estate business procures its construction projects via UK-based regional and national main contractors. Our residential business includes our own UK-based housebuilding activity, predominantly undertaken through St. Modwen Homes. St. Modwen Homes procures the construction programme for its houses via a traditional network of local trade contractors.

### Modern Slavery Working Group

During 2018 we established a Modern Slavery Working Group, comprising representatives from the senior leadership teams of our commercial real estate business, the asset management team and our residential business, St. Modwen Homes. The Group was formed in order to consider more fully St. Modwen's risk of exposure to modern slavery and human trafficking across all our business activities and to develop processes and procedures to combat and mitigate those risks. The Group is currently led by the Construction Director.

The Group will continue to meet on a regular basis to ensure progress is made against St. Modwen's modern slavery and human trafficking objectives and in order to continually review the risks to the business and the policies and procedures it has in place to counter modern slavery and human trafficking.

## Policies and Implementation

During the 2018 financial year, we further strengthened our commitment to combating modern slavery and human trafficking by developing our Anti-Slavery and Human Trafficking Policy which is to be embedded within the business.

We also reviewed our Whistleblowing Policy to ensure it is compatible with the potential for individual reporting of suspected incidents of modern slavery or human trafficking and will be working in the forthcoming year to further enhance our whistleblowing procedures visibility across the business.

## Progress in 2018

We had no suspected incidents of modern slavery or human trafficking reported in respect of any of our business activities in 2018.

As part of our continued efforts to monitor and reduce the risk of modern slavery and human trafficking occurring within our supply chains, we have instigated the following procedures during the 2018 financial year across our key business streams:

### Commercial Real Estate Business

- Contractor pre-qualification requires confirmation from the contractor that it has its own anti-slavery and human trafficking policy or that, in lieu of its own policy, it will adhere to St. Modwen's policy;
- All construction tender returns include a written declaration from the tendering contractor that it:
  - has reviewed St. Modwen's anti-slavery and human trafficking policy;
  - has complied fully with the Act, St. Modwen's anti-slavery and human trafficking policy and/or their own anti-slavery policy;
  - is not aware of any acts or incidents affecting the contractor, any of its group companies or any of its supply chain which may constitute a breach of the Act, St. Modwen's anti-slavery and human trafficking policy and/or the contractor's own anti-slavery policy.

- St. Modwen's contract award procedure has been strengthened and now requires verification of compliance with both the pre-qualification and tender declaration procedures before a building contract is awarded;
- Breach of these contractual provisions can lead to the termination of the contract.

#### St. Modwen Homes

- Trade Contractor pre-qualification requires confirmation from the trade contractor that it will adhere to St. Modwen's anti-slavery and human trafficking policy;
- St. Modwen Homes' standard trade contract has been updated to include specific obligations relating to compliance with the Act and St. Modwen's anti-slavery and human trafficking policy. Breach of these contractual provisions can lead to the termination of the trade contract.

#### Asset Management

- A senior representative on the working group and a key 2019 objective will focus primarily on reviewing the risks associated with asset management and tailoring processes and procedures to meet specific requirements in relation to modern slavery and human trafficking.

### **Going forward – 2019 Objectives**

We will continue to improve our approach to combating modern slavery and human trafficking within our business and supply chains and championing our zero tolerance approach. We intend to take the following steps during 2019:

- Conduct a review and risk assessment of our supplier basis with our asset management team;
- Upgrade the procurement policies and terms and conditions used by the asset management team, in line with the changes we have made across the commercial real estate business and St. Modwen Homes;
- Review the modern slavery risks across the remaining business units and head office functions and make recommendations for combating and mitigating any risks identified;
- Reinforce internal reporting lines to further enhance the reporting of potential modern slavery incidents;
- Work with our main contractors to improve on-site awareness of the risks of modern slavery and human trafficking and roll out an awareness programme on all St. Modwen Homes' sites;
- Instigate KPIs for measuring and reporting on the effectiveness of our anti-slavery and human trafficking policies and procedures.

## Sign off

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes St. Modwen's slavery and human trafficking statement for the 2018 financial year.

This statement was approved by the Board on 29 March 2019.

Signed by:



Mark Allan, Director

For and on behalf of St. Modwen Properties PLC

Date: 23 April 2019