

## **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 Big Box REIT plc's slavery and human trafficking statement for the financial year ending 31 December 2021.*

### **About the Company**

Tritax Big Box REIT plc is the only listed vehicle dedicated to investing in very large logistics warehouse assets ("Big Boxes") in the UK and is committed to delivering attractive and sustainable returns for Shareholders. Investing in and actively managing existing built investments, land suitable for Big Box development and developments predominantly delivered through pre-let forward funded basis, the Company focuses on large, well-located, modern Big Box logistics assets, let to institutional-grade tenants on long-term leases (typically at least 12 years in length) with upward-only rent reviews and geographic and tenant diversification throughout the UK. As at 31 December 2021 the Company's portfolio comprised 70 assets, with a portfolio value of £5.50 billion including all forward funded development commitments.

The Company has appointed Tritax Management LLP ("the **Manager**") 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.

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 Big Box REIT plc is available at <https://www.tritaxbigbox.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 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 on 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 and 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.
- Specifically, Tritax Symmetry, our development arm, have a modern slavery clause incorporated into their building contracts. This prerequisite clause ensures that third parties we work with are also following and adopting the legislation.
- We are conducting regular reviews of our current service providers and suppliers against the guidelines, policies and regulations they follow to enable us to monitor the companies we are working with.
- 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 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'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 and Compliance is taking steps 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. These codes and policies will 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 will be monitored by the Manager.
- 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.
- Our Head of Risk and Compliance will be undertaking a similar analysis of Modern slavery disclosures and processes, the Compliance Team carried out when reviewing companies against the Criminal Finances Act. This investigation involved reviewing bank accounts for a full month and analysing incoming and outgoing payments. The types of companies that were engaged with were ranked according to the risk they posed of enabling tax evasion. Our team will be mirroring this analysis by looking at companies we are engaging with and ranking them based on the level of scrutiny their modern slavery policies are subjected to and the level of regulatory input.

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



**Tritax Big Box REIT plc**  
Chairman

