

**SLAVERY AND HUMAN TRAFFICKING STATEMENT**  
**FOR BRIGHTBAY REAL ESTATE PARTNERS LIMITED**  
**Modern Slavery Act 2015 (the “Act”)**  
**(“Brightbay” the “Company” or the “Group”)**  
**FOR THE YEAR ENDED 31 DECEMBER 2023**

## **Introduction**

In accordance with section 54 of the Act, every organisation which supplies goods or services and carries on a business in the UK, with a total annual turnover of £36 million or more, is required to produce a slavery and trafficking statement each financial year advising of the steps taken to prevent modern slavery in its own business and supply chain.

This statement has been prepared and published in accordance with the Act relating to the Company's financial year ending 31 December 2023. The statement sets out the steps that Brightbay has taken and is proposing to take in order to address the risk of slavery and human trafficking that may be taking place in our business or within our supply chain.

## **Our Structure**

Brightbay is a UK Real Estate Investment Trust listed on The International Stock Exchange (TISE). At 31 December 2023, Brightbay owned a £0.6 billion property portfolio. Our annual turnover was £45.9 million, arising primarily from the leasing of commercial and hotel properties in the UK. The Company employed 15 people, all of whom are paid at or above the real living wage.

## **Our Supply Chains**

The Group's operations in 2023 were located predominantly in the UK.

Our supply chain is broad and includes direct suppliers (contractors, subcontractors, property managers, legal advisors, real estate advisors and professional service providers) as well as indirect suppliers such as cleaning and security contractors. As these suppliers were engaged in UK, where there are few human rights' issues, the risk of exposure to modern slavery within the Group is considered to be low.

Our supply chain consists of approximately 130 suppliers. Our total spend with these third parties amounted to £9.8 million in the 2023 financial year. Broadly this was spent on property-related expenses and company running costs.

## **Modern Slavery Policies**

We are committed to preventing modern slavery or human trafficking in our business and throughout our supply chains. The Group has in place a number of policies which support our commitment to acting ethically and with integrity throughout the business, some of which are listed below:

- Code of Ethics and Conduct for Suppliers
- Equal Opportunities Policy
- Health and Safety Policy
- Anti-bribery Policy
- Whistleblowing Policy
- Sustainability and Social Responsibility Policy
- Anti-facilitation of tax evasion Policy

## **Due Diligence Processes**

The Group takes the following steps to minimise the risks:

- Subsidiary companies and joint venture arrangements – due diligence is performed on all directors of subsidiaries and shareholders.
- Assets – all necessary due diligence is performed when acquiring assets.
- Tenants – new leases require that tenants adhere to the Act.

- Employees and the Company – are required to adhere to a Code of Ethics and the Employee Handbook. As part of the formal induction process, all new employees are made aware of the Company's Modern Slavery statement and how to raise concerns through the Group's Whistleblowing Policy and independent Whistleblowing hotline, which is included in the Employees handbook, and on the Company's website.
- Suppliers – We actively communicate our social and ethical standards to all our suppliers through our onboarding processes. Brightbay expects suppliers, *inter alia*, to (i) not employ child labour; (ii) pay at least the living wage; (iii) ensure working hours are not excessive; (iv) respect the right to collective bargaining; and (v) ensure no harsh or inhumane treatment is tolerated.

### **Risk Management**

The Group's process for identifying and managing risk, including modern slavery, is set by the Board.

A leading accounting firm conducted an internal audit on the Company's regulatory compliance in 2017, including its due diligence processes in relation to slavery and trafficking in its business and supply chain. All suggested improvements were addressed.

A Sustainability and Social Responsibility ("SSR") Committee was appointed in 2014 and a SSR policy adopted to ensure that the highest standards of ethical behaviour are maintained.

### **Ongoing Effectiveness**

The Group will continue to monitor the effectiveness of the steps we have taken to stop slavery or human trafficking taking place in the business and supply chains, including monitoring the need for further actions as we continue our risk assessment and due diligence activities and receive responses from key suppliers.

In conducting business, the Group adheres to a Code of Ethics which promotes honesty and integrity in all business dealings and conduct befitting the reputation of the Company. Any instances of unethical behaviour or an abuse of human rights, including modern slavery, can be reported by employees (the term of which includes suppliers) using the Whistleblowing Policy, Whistleblowing hotline or to a line manager. No human rights' concerns or whistleblowing reports were received during the financial year ended 31 December 2023.

We will be revisiting this statement annually to provide an updated account of our Company's efforts to combat this global problem.

**This Statement was approved by the Board on 21st May 2024.**

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Stephen Oakenfull, CEO  
Brightbay Real Estate Partners Limited