



ST.MODWEN

MODERN SLAVERY ACT 2015

TRANSPARENCY STATEMENT

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This modern slavery and human trafficking statement is made by St. Modwen Properties PLC on behalf of the companies within its group ("**St. Modwen**") pursuant to section 54 of the Modern Slavery Act 2015 (the "**Act**").

St. Modwen has zero tolerance to slavery and human trafficking in all its business activities. We are committed to the prevention of slavery and human trafficking in all its forms and will not tolerate or condone it within any part of our business or supply chains.

This statement describes the steps that the St. Modwen has taken in the financial year ended 30th November 2017 (the "**2017 financial year**") towards seeking to ensure that slavery and human trafficking is not taking place in in any part of our business or supply chains.

1. Structure and Supply Chains

St. Modwen operates across the full spectrum of the property industry and adds value by managing schemes through the planning process, remediating brownfield land and active asset management and development.

Commercial development activity

St. Modwen is a UK-focused owner and developer and procures its construction projects via UK-based regional and national main contractors for various commercial and infrastructure projects.

Residential development activity

St. Modwen's 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. You can find out more about St. Modwen Homes at www.stmodwenhomes.co.uk

2. Policies and Supply Chain Due Diligence

During the 2017 Financial Year we have taken the following steps to enhance our anti-slavery procedures:

- Developed our Anti-Slavery and Human Trafficking Policy;
- Implemented a new main contractor conditions of contract with enhanced Modern Slavery Act provisions for use on commercial real estate projects;
- Prepared revised trade contracts, pre-tender qualification documents and professional consultant appointments to include enhanced Modern Slavery Act obligations; and
- Trained our key professional consultants on our Master Framework Agreements which include enhanced Modern Slavery Act provisions.

As part of our continued efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have continued the process of obtaining written statements of compliance from our main contractors in respect of adherence with the requirements of the Act. St. Modwen has also implemented a compliance programme with its key supply chain partners, strengthening the pre-qualification process to require each contractor to provide:

- an annual declaration from the relevant contractor confirming their compliance with the provisions of the Act;
- a copy of the contractor's annual modern slavery statement (where required to produce one in accordance with section 54 of the Act); and
- a copy of the contractor's anti-slavery and human trafficking policy (if applicable).

These measures help to highlight to our contractors the seriousness with which we regard the issue of compliance with the Act and also enable us to gain greater visibility over our contractors and suppliers to ensure they share the same commitment to combating modern slavery and human trafficking as St. Modwen. Failure to provide the requested information (despite being required to produce it under the Act) may result in a contractor being excluded from our approved contractor database. Equally if we assess that a contractor's approach and policies towards combating modern slavery are inadequate, this will impact on whether we decide to work with them as a partner.

Further, evidence that any of our contractors or suppliers have failed to comply with the Act and on notification from St. Modwen have failed to remedy such non-compliance, may result in termination of our relationship with that contractor.

3. Risk Assessment and Future Plans

St. Modwen acknowledges that the prevalence of a flexible labour force within the construction industry (often involving the use of temporary or migrant workers) potentially creates a higher risk of exploitation, particularly where cost is such a key driver. As an Employer/Client, St. Modwen itself has little direct control or transparency over the identity of its contractors' workforce or the working and living conditions further down the supply chain. Therefore, in order to mitigate these risks, we only engage with reputable, well-established and UK-based main contractors who pass our pre-qualification processes in respect of the Act and can meet their contractual obligations in terms of compliance. Those contractors are then required to step those requirements down to their own suppliers and contractors, in order to drive higher standards further down the supply chain.

We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain, and in terms of actions for the financial year ending 30th November 2017, we aim to carry out more detailed mapping of our supply chains, in particular in relation to the St. Modwen Homes business, in order to identify where potential risk areas may lie so that we can implement appropriate systems for monitoring compliance with the Act.

During the 2017 financial year we have undertaken a detailed mapping of our contractors in order to assess our exposure to modern slavery within the supply chain. On the commercial real estate development side of the business, we procure almost exclusively on a single point design and build basis via reputable, well-established and UK-based main contractors

4. Training, Effectiveness and KPIs

The Construction Team for commercial real estate development, together with our external project management consultants have undergone training on the revised contracts for main contractors and the Master Services Agreements, including the enhanced Modern Slavery Act provisions contained within those contracts.

We intend to further focus on supply chain mapping as well as targeted training for individuals to be vigilant and aware of the Act and the effects of Modern Slavery.

In addition St. Modwen has a whistleblowing policy in place and staff may report concerns through a confidential helpline operated by a third party.

5. 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 2017 financial year.

This statement was approved by the Board on 23rd April 2018

Signature:



Mark Allan, Director
St. Modwen Properties PLC

Date: 2nd May 2018