

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 ("**St. Modwen**") pursuant to section 54 of the Modern Slavery Act 2015 (the "**Act**") and covers the financial year ended 30 November 2019 (the "**2019 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 – respect for others is a fundamental part of our culture and values as an organisation. St. Modwen fully supports the implementation of the Act and has and will continue to treat its responsibilities under the Act with the seriousness they require and deserve.

This is St. Modwen's fourth annual statement and describes the steps that we have taken this year towards seeking to prevent slavery and human trafficking from taking place in any part of our business or supply chains.

Our Business Structure

St. Modwen is an expert developer with over 30 years of property and regeneration expertise. During 2019 we have seen a significant restructuring of the operating parts of the Group, with these being segregated into three dedicated business units in the UK:

- St. Modwen Homes;
- Industrial & Logistics; and
- Strategic Land & Regeneration,

The company is a constituent of the FTSE250, with a portfolio totalling £1.48bn.

2019 has been a positive year for St. Modwen, with a continued increase in momentum in delivering our growth-focused strategy. During the year the restructuring has aligned the business to our three strategic objectives: build a high-quality industrial and logistics business, grow our residential and housebuilding business, and leverage our regeneration reputation. As part of this restructuring, the asset management function was split across the three dedicated business units.

Our Employees

St Modwen employs 622 people in the United Kingdom, primarily based in Birmingham, London or Bristol. Through our Code of Conduct every employee commits to act with the highest standards of ethics and integrity and to respect Human Rights and to consider whether any of our operations could have an adverse impact on the Human Rights of our employees, customers, suppliers, the community or any parties with whom we do business.

Our employees are responsible for complying with our policies that seek to prevent modern slavery and human trafficking, and anyone found to be in violation of this policy may be subject to disciplinary procedures.

Our Supply Chain

Throughout 2019, we continued to work with an extensive supply chain in support of our property development and housebuilding activities.

We have assessed the various areas of our supply chain and considered which have the greatest potential risk associated with Modern Slavery. These are construction contracts and facilities management operations. Since 2018 all construction contracts contain clauses setting out our Code of Conduct and statements in respect of Modern Slavery and ensures that these flow down to the contractors, who give undertakings to ensure compliance with the Modern Slavery Act 2015 and to confirm such compliance on an annual basis.

Should we become aware of a case of Modern Slavery within our supply chain, we would engage with the appropriate authorities and the supplier to take action, ensuring consideration of approach to ensure the safest outcome for any potential victims.

Our Policies

The St Modwen Code of Conduct sets out our position on Human Rights and Modern Slavery and confirms our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business.

Our whistleblowing policy "Speak Up" provides a platform through which any employee, supplier or partner can report suspected instances of modern slavery or human trafficking with complete anonymity and in the knowledge that it will be fully investigated by the company.

Progress in 2019

We have had no suspected incidents of modern slavery reported in respect of any of our business activities in 2019.

We have reviewed, updated and re-launched our whistleblowing policy (now branded as "Speak Up") and launched an app to accompany the new policy. This enhanced whistleblowing framework further strengthens our commitment to the prevention of modern slavery and human trafficking within our business.

Across the three business units we saw the following progress:

Industrial & Logistics and Strategic Land & Regeneration

Both of these business units procure their construction projects via UK-based regional and national main contractors. Therefore, the focus of their anti-slavery and human trafficking activities have been on the pre-qualification of main contractors, the tendering of projects and the robustness of anti-slavery provisions in the contracts entered into with those main contractors.

The planned adoption of an online supplier information and supply chain management system during 2020 will further enhance the pre-qualification checks and protections.

St. Modwen Homes

St. Modwen Homes introduced the requirement for all new subcontractors going through a pre-qualification process to comply with the Modern Slavery Act 2015.

All existing subcontractors have also signed and returned a separate undertaking to comply with the Modern Slavery Act 2015.

We have also introduced conditions to all our subcontractor framework contracts requiring compliance with the Modern Slavery Act 2015.

Asset Management

The re-organisation of the central asset management function (and its devolution into the three business units) means that we have not made the progress we had anticipated in respect of the objectives we had set for asset management. The focus of the three business units and the Modern Slavery Working Group will now be primarily on mapping the risk within each of their asset management functions and implementing appropriate practices and procedures, including procurement policies and appropriate terms and conditions.

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 2019 financial year.

This statement was approved by the Board on 27 March 2020.

Signed by:



Rob Hudson, Director
For and on behalf of St. Modwen Properties PLC

Date: 16 April 2020