

## HELICAL PLC

# Modern Slavery Act 2015: Slavery and Human Trafficking Statement

## Organisation's Structure

Helical plc ("Helical") is a UK focused property development and investment company. Our activities comprise the development of commercial, residential and mixed use property and the ownership and management of a portfolio of office, logistical and retail properties in the UK. The Group has 35 employees based at our head office in London and a further 53 employees based at buildings within the portfolio (31 March 2016). The Group has an annual turnover of £116,500,000 (31 March 2016).

#### **Our Supply Chains**

Our supply chains include external asset managers, development managers, contractors, subcontractors, goods and services suppliers and professional service providers.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Helical has in place a number of policies which support our commitment to acting ethically and with integrity in all our business relationships. These policies are outlined below.

# Anti-Slavery and Human Trafficking Policy

We have introduced an Anti-Slavery and Human Trafficking Policy, which sets out our zero tolerance approach to modern slavery and our commitment to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The policy is available to download on the <u>Corporate Responsibility</u> section of our website and is distributed to all staff.

## **Employment Policy**

This confirms that Helical recognises the importance of the welfare of our employees and is committed to complying with all applicable laws and regulations. Our policy is to pay at least the Minimum Wage to all direct employees and to encourage our suppliers to adopt an appropriate system for remuneration. The policy also confirms that we never use forced, compulsory or child labour and ensure all labour is voluntary and is employed in accord with applicable labour laws and international standards. The policy is available to download on the <u>Corporate Responsibility</u> section of our website and is distributed to all employees in our staff handbook.

#### Health and Safety Policy

Helical's Health and Safety policy aims to develop a corporate culture that is committed to the prevention of injuries and ill health to its employees or others that may be affected by its activites. The requirements of the policy are binding for all staff, retained consultants and visitors within Helical. All sub-sections of the policy are communicated, implemented and monitored. The policy is available to download from the <u>Health and Safety</u> section of our website and is distributed to all staff in our employee handbook.

## Corporate Responsibility Policy

Our objectives under this policy include:

- We will ensure that all of our development sites and property assets implement appropriate health and safety practices in line with regulatory requirements, to protect our contractors, sub contractors, tenants, employees and visitors;
- We will work collaboratively with our managing agents and consultants to ensure that our managed portfolio provides best practice to our occupiers in terms of sustainability, environmental and health and safety compliance; and
- We will seek to apply appropriate sustainable procurement standards for our development and asset management activities, focusing on labour standards and environmental compliance.

Our objectives are supported by the following measurable targets:

- Require project teams to source timber, if used, from sustainable sources and aim for a minimum of 50% chain of custody certified timber to Forest Stewardship Council certification to demonstrate consideration of human rights for communities and forest workers; and
- Require our principal contractors to confirm the legitimacy of the workforce on site as also verified through the Considerate Constructors' Scheme.

## Anti-Bribery and Corruption Policy

The policy confirms Helical's zero tolerance of bribery and corruption and extends to all of our business dealings and transactions in all countries in which we or our subsidiaries operate. All directors, employees and third parties are required to comply with the policy, which is given force by a range of bribery prevention procedures. The Anti-Bribery and Corruption Policy and Procedures are available to download from the <u>Bribery and Corruption</u> section of our website and is distributed to all staff in our employee handbook.

## Whistleblowing Policy

Our Whistleblowing Policy encourages employees to report legitimate concerns over malpractice or misconduct, without fear of penalty or punishment. The policy is available to download from the <u>Bribery and Corruption</u> section of our website and is distributed to all staff in our employee handbook.

In addition to the above we require project teams to source timber, if used, from sustainable sources and aim for a minimum of 50% chain of custody certified timber to Forest Stewardship Council certification to demonstrate consideration of human rights for communities and forest workers

In the year to 31 March 2017 we intend to take the following further steps to combat slavery and human trafficking:

Introduce a clause in our key commercial agreements asking suppliers to confirm that
they will comply with our Anti-Slavery and Human Trafficking Policy as well as all
applicable laws, statutes and regulations from time to time in force;

- Include within our Corporate Responsibility Policy an objective confirming that we will seek to ensure that modern slavery is not taking place anywhere in our own business or supply chains;
- Require our asset management teams to minimise the use of agency staff at our properties, to minimise the risk of labour exploitation within our supply chains;
- Require our suppliers to ensure that the products and services they use are sourced from responsible suppliers; and
- Widen the scope of our Whistleblowing Policy to include the reporting of slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2016.

Approved by a Board Committee on 17 January 2017 and signed on its behalf by:

Gerald Kaye

Chief Executive

Helical plc