

Modern Slavery Statement For the year to 31 March 2022

Introduction

This Modern Slavery Statement ("Statement") is for the LondonMetric Property Plc group ("LondonMetric" or the "Company") and is made in accordance with section 54 of the Modern Slavery Act 2015 (the "Act"). It covers LondonMetric and its subsidiaries and joint venture interests listed in Appendix 1, for the financial year ended 31 March 2022.

This Statement provides an overview of our business activities and the policies and processes we have in place to prevent modern slavery and human trafficking occurring within our business and supply chains as required by the Act.

Our business

LondonMetric is a UK Real Estate Investment Trust (REIT) listed on the London Stock Exchange and a FTSE 250 company. We have 35 employees operating from our main London office and a satellite office in Birmingham. As at 31 March 2022 we managed £3.6 billion of real estate assets located within the UK. The majority of the portfolio is wholly owned, but we also manage under £193 million of investments held in joint venture.

Our assets are predominantly single occupier logistics hubs managed in-house where tenants are responsible for the provision of services within the buildings they let from us under Full Repairing and Insuring (FRI) leases. We outsource day-to-day management for predominantly multi tenanted retail schemes, which comprise a small and diminishing element of our portfolio, and a number logistics assets to reputable firms of managing agents.

A small proportion of our portfolio (1.9% as at 31 March 2022) comprises of assets which we are developing for income or assets where a significant refurbishment programme is being undertaken.

Policies

We recognise it is our responsibility to behave responsibly and to be aware of the risks of slavery, forced labour and human trafficking within our organisation and supply chains. We are committed to a zero tolerance of such practices and are prepared to stop working with suppliers and service providers who won't deliver on our policies.

Risk assessment

Employees

We continue to firmly believe that none of our employees are the victims of slavery and human trafficking. We have a small, tightknit team of office based professionals working out of two locations and a flat management structure. Most of our staff have been employed by us for a considerable number of years, all with contracts of employment under which they receive fair and performance based remuneration, a pension contribution of at least 10% of salary and benefits such as private health care and life cover. We have flexible working arrangements in place around a core hours framework and an employee handbook which includes a whistleblowing policy. During the review period we undertook our fifth annual employee survey to gauge overall employee satisfaction and its results are summarised on page 61 of our Annual Report and Accounts for 2022. We again scored highly in areas relating to welfare and improved on the high satisfaction scores from the previous year. This survey supplements our annual one-to-one staff assessment process.

Contractors and service providers

We recognise that there are areas of our operations and supply chain such as construction, security, landscaping and cleaning, where it is generally acknowledged that the risks of modern slavery and trafficking may be higher. We believe however that our exposure is limited by our UK only activities and the Responsible Procurement Policy (“Procurement Policy”) implemented by our Responsible Business Working Group in 2015 to help meet our responsible business objectives. Our Procurement Policy’s aim is to ensure appropriate supply chain and procurement standards in areas such as labour, human rights, health & safety and environmental matters.

Construction

It is LondonMetric’s intention to build and maintain strong relationships with a limited number of trusted Contractors.

Contractors working on our projects must adhere to our Responsible Development Requirements Checklist (“Checklist”). The checklist sets minimum compliance standards including fair treatment and remuneration for employees, responsible procurement, environmental impact data collection and reporting and health & safety management.

Under our Checklist contractors are required to sign up to and comply with the requirements of the Considerate Constructors Scheme (the “Scheme”) which encourages industry best practice for respecting the community, caring for the environment and valuing the workforce. The organisation which operates the Scheme monitors contractor commitments through audits which are shared with LondonMetric. Any issues raised are reviewed with the Contractors and change implemented where necessary.

On larger developments our Checklist also requires contractors to use reasonable endeavours to complete works which are capable of achieving a minimum BREEAM rating of ‘Very Good’ and Energy Performance Certificates (EPCs) of a minimum ‘B’ rating. These certifications include aspects which incentivise responsible sourcing of construction materials, such as the management of human rights in the production, transportation and assembly of materials. All our major refurbishments and key developments have achieved a ‘Very Good’ or ‘Excellent’ BREEAM accreditation during the year.

In addition to looking at ways of improving our contractors’ performance we continue to monitor compliance against the Checklist through the external project management consultants we employ on each development who work in conjunction with our development professionals. These key members of the professional team are familiar with our responsible business and human rights policies and practices.

Last year our development managers undertook a detailed review of the systems and processes at A Surman & Co Limited (“A Surman”), a key contractor employed on contracts that range from sub £20,000 to circa £500,000 across our Midlands industrial portfolio. Their review concluded that A.Surman have robust policies in place.

During the year, a similar review was performed on Mildren Construction Limited (“Mildren”) a key contractor employed on small-medium scale retail developments with contract values up to £10m. The review concluded that Mildren clearly share similar values to LondonMetric. They have very good policies in place and a positive approach to responsible procurement and health & safety management. The audit has identified that Mildren are implementing amendments to its supplier contracts to strengthen contractual obligations on their supply chain with regards to compliance with modern slavery and anti-bribery legislation. Key findings from the audit include –

- A clear push to build and maintain strong and trusted relationships with like-minded suppliers
- Staff retention is very high with annual turnover at less than 0.5%
- A drive to promote awareness of the Modern Slavery Act within its supply chain and employees
- Minor amendments to pre-qualification questionnaires and supplier contracts to be made to contractually strengthen obligations on the supply chain with regards to Modern Slavery and Anti-Bribery
- Very robust procedures in place for payment authorisations and supplier credit checks

- Responsibility of health & safety championing and management within the organisation is clear and stems from top management
- Clear policy and procedures for health & safety incident tracking and management
- Responsible development achieving very high scores demonstrating Mildren are clearly a considerate contractor within the communities it works in.


This coming year in addition to our annual health & safety audits on a sample of our projects we intend to fully review a further contractor with a particular focus on local sourcing, modern slavery and the minimum wage.

Service providers

Our portfolio has very limited landlord management responsibilities given the FRI nature of the bulk of our leases with occupiers. Our annual spend on the provision of services is therefore relatively small. Where we do provide services the majority of contracts are procured through leading firms of managing agents with responsible supply chain, anti-slavery and human trafficking policies in place and training for key staff on their implementation. We review our managing agents' policies periodically and monitor service provider compliance against them.

Over the recent years we have reviewed the top service providers procured through the larger managing agents we employ (Savills, Fidum and Cushman & Wakefield) on services such as cleaning, landscaping, maintenance and security. We have been satisfied that these providers pay at least the minimum wage and have policies and procedures in place which are in line with our expected standards and policies. No concerns have been noted.

Approved by the Board of Directors



Martin McGann
Finance Director & Head of Responsible Business Working Group

20 July 2022

Appendix 1

List of subsidiaries

Details of our subsidiaries are contained on pages 190 – 192 of our Annual Report and Accounts for 2022.