

HB Reavis Construction UK Ltd (the “Company”) – Slavery and Human Trafficking Statement for the Financial Year 2015 to 2016.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015, and outlines the steps which the Company has taken to ensure that instances of slavery and human trafficking do not occur within our business or our supply chains.

GROUP STRUCTURE

HB Reavis Construction UK Ltd is part of the HB Reavis Group, which is a fully integrated property developer with a major portfolio of investment properties. The Group has employees worldwide and operates in Slovakia, Czech Republic, Poland, Hungary and the United Kingdom and is currently seeking to expand in Germany and Turkey.

OUR BUSINESS

The HB Reavis Group is a fully integrated property developer applying a unique approach to the complete development chain, from identifying investment opportunity through to the design, construction and management of the resulting standing asset. In the United Kingdom, we specialise in the development and management of trendsetting office space solutions.

OUR SUPPLY CHAINS

Our supply chains include trade contractors, sub-contractors, building product suppliers, consultants, IT and office equipment providers, professional services from lawyers, accountants and other advisors. In certain circumstances, we will administer the performance of such services for our clients as their development manager.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

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. Our zero-tolerance approach to modern slavery reflects 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 supply chains. We expect each and every entity in our supply chain to conduct due diligence on their suppliers, particularly where it is not practical for us to have a direct relationship with all links in the supply chain.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we carry out a risk assessment of our business and, at the procurement stage, each entity in our supply chain.

As part of the risk assessment carried out at the procurement stage, we have adopted systems to:

- Identify and assess potential risk areas in our supply chains, by ensuring that new suppliers and contractors must go through our risk assessment prior to being engaged. Typically, such risk assessments will require the completion of reference checks and a pre-qualification questionnaire; which specifically requires the supplier/contractor in question to

outline the steps they are taking to ensure there is no modern slavery or human trafficking in their supply chain or in any part of their business. In addition, we hold interviews with key personnel of each supplier/contractor and canvass opinion from our professional advisors in respect of the suitability of a supplier/contractor, prior to engagement.

- Mitigate the risk of slavery and human trafficking occurring in our supply chains, which we manage through our new supplier process and the inclusion of provisions on modern slavery and human trafficking in our contracts.

SUPPLIER ADHERENCE TO OUR VALUES

We do not tolerate slavery and human trafficking. We require those in our supply chain to comply with our values and we have begun to put in place a supply chain compliance programme. This consists of reviewing trade contracts, management agreements, professional appointments and adding provisions into contracts or terms and conditions requiring the supplier to comply with the Modern Slavery Act 2015.

We are committed to ensuring this process works effectively and will monitor it regularly, adapting as necessary to the changing needs of our business.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff on the risks posed by these issues and the Company's approach to modern slavery and human trafficking.

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



Paul Neto

Managing Director

HB REAVIS CONSTRUCTION UK LTD

Date: 29 June 2017