

STOFORD PROPERTIES LIMITED

MODERN SLAVERY ACT 2015: SLAVERY AND HUMAN TRAFFICKING STATEMENT

This modern slavery and human trafficking statement is made by Stoford Properties Ltd on behalf of the companies within its group ("Stoford") pursuant to section 54 of the Modern Slavery Act 2015 (the "Act"). It describes the steps taken by Stoford towards seeking to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

Stoford 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 applies to the financial year ended 30th June 2018. Additionally, this statement describes steps taken during the period 1st July 2018 to 31st January 2019. We will update this statement following the end of the current financial year, ending 30th June 2019.

1. Structure and Supply Chains

Stoford is a UK-focused commercial developer. With extensive experience in dealing with complex and challenging sites, Stoford is focused on the long-term development of commercial property.

Stoford procures its construction projects via UK-based regional and national building contractors and are supported by specialist professional consultants to deliver these projects.

2. Policies and Supply Chain Due Diligence

By 30th June 2019, Stoford aims to include appropriate clauses in its standard construction documents (building contracts and professional consultant appointments) placing an obligation on the contractor or consultant (as applicable) to comply with UK legislation, including the Act.

Additionally, before entering into a contract with a consultant or contractor, our pre-qualification process has been recently revised and requests the following:

- 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).

If we were to find evidence that one of our contractors or consultants had failed to comply with the Act then we would encourage the relevant contractor or consultant to remedy such non-compliance and we would consider terminating our relationship should we see no improvement in changing procedures to achieve compliance with the Act.

The Company has revised its employment policies and will be introducing a staff handbook containing a Whistleblowing policy, to be implemented by 30th June 2019. This provides a clear route for concerns to be raised and ensures the protection of whistle blowers who report slavery or human trafficking.

3. Risk Assessment and Future Plans

Stoford 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. Given the nature of the construction industry, Stoford itself has little direct control or transparency over the identity of its contractors' workforce or the working and living conditions at the bottom on the supply chain. Therefore, in order to mitigate these risks, Stoford 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. Stoford then require them to flow down those requirements to their own suppliers and contractors to drive higher standards further down the supply chain.

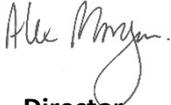
4. Training, Effectiveness and KPIs

As at **31st January 2019**, we have received declarations of compliance and details of modern slavery statements and policies from 23 of the 24 contractors we identified as Stoford's key supply chain partners and who fall under the remit of the Act. These declarations are held under a register system, and we aim to increase the number of compliant contractors in the financial year ending **30th June 2019**.

Prior to publication, this statement was communicated to all Stoford employees, and we have confirmed that any queries about its content or application, or any requests for training relating to this matter should be directed to the Managing Directors.

5. Sign Off

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Stoford's slavery and human trafficking statement for the financial year ending **30th June 2018**.

Signed: 
Title: **Director**
Date: **20 March 2019**