



HELICAL PLC

Modern Slavery Act 2015: Slavery and Human Trafficking Statement

This is Helical's third statement made pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes the Company's Slavery and Human Trafficking Statement for the financial year ended 31 March 2019.

Our Business

Helical plc ("Helical") is listed on the London Stock Exchange. Our core business is developing and owning dynamic, well located office space in London and Manchester. The Group had 32 employees as at 31 March 2019 and an annual turnover of £44,175,000 (31 March 2019).

In accordance with the s.172 Companies Act 2006 duty to promote the success of the Company, the Board takes modern slavery and human trafficking into account when making decisions, and places continuous emphasis on the importance of preventing and mitigating all potential risks associated with modern slavery in the Company's supply chain.

Based on our ongoing risk assessment, we believe that the risks of modern slavery and human trafficking in the recruitment and engagement of our employees is low.

Our business model involves working with a range of contractors, suppliers, service providers and advisors for the development, refurbishment, maintenance and operation of our property portfolio.

Our Supply Chains

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

We believe that our highest risk areas, relating to modern slavery and human trafficking, relate to our construction and refurbishment contractors and subcontractors, and associated supply chains.

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 a number of policies and procedures in place 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

This sets out our zero tolerance approach to modern slavery and our commitment to implementing and enforcing effective systems and controls to prevent slavery and human trafficking taking place anywhere in our supply chains. The policy is available to download on the [Corporate Responsibility](#) 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 London Living 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 [Corporate Responsibility](#) 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 activities. 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 [Health and Safety](#) 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 and employees;
- We will seek to apply appropriate sustainable procurement standards for our development and asset management activities, focusing on labour standards and environmental compliance; and
- We will seek to ensure that modern slavery is not taking place anywhere in our business or in any of our supply chains.

Our objectives are supported by the following measurable targets:

- Achieve zero reportable accidents/incidents throughout 100% of the managed assets and on 100% of our construction sites;
- Require our suppliers to ensure that the products and services they use are sourced from responsible suppliers;
- 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;
- 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; 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 [Bribery and Corruption](#) section of our website and is distributed to all staff in our employee handbook.

Whistleblowing Policy

The Company has in place a means for its workforce to raise concerns in confidence and anonymously. The Board has oversight of the Companies whistleblowing procedures and routinely review their operation.

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 [Bribery and Corruption](#) section of our website and is distributed to all staff in our employee handbook.

Anti-Facilitation of Tax Evasion Policy

This policy confirms Helical's zero tolerance of the facilitation of tax evasion and extends to all our business dealings and transactions, in all countries in which we and our subsidiaries operate. All directors, employees and third parties are required to comply with the policy. The Anti-Facilitation of Tax Evasion Policy is available to download on the [Corporate Responsibility](#) section of our website and is distributed to all employees.

Year ended 31 March 2019

During the year ended 31 March 2019 we have taken the following steps towards ensuring that slavery and human trafficking does not exist in our business and supply chains:

- The Board has identified that non-compliance with prevailing legislation, regulation and best practice on modern slavery and human trafficking could serve to impede the growth of the Company. The Board has expressly stated its commitment to prevention and mitigation of risks associated with modern slavery and human trafficking as being a key part of Helical's strategy.
- Helical has launched a Supplier Code of Conduct ('Code of Conduct'/'Code') which sets out our expectations relating to our suppliers and their obligations in the following areas:
 - a. **Health and Safety** - including: training and information, avoidance of materials harmful to health, use of method statements and/or risk assessments, insurance, occupational health services and procedures for responding to and reporting accidents or emergency situations.
 - b. **People** - including: forced labour, child labour, working hours, payment and discrimination
 - c. **Ethics and Legal Compliance** - including; ethical working practices, anti-bribery and corruption, money laundering and fraud, anti-facilitation of tax evasion, data protection and whistleblowing.
 - d. **CSR and the Environment** - including: engagement with the community and environmental management.
- It is Helical's policy to actively communicate the Code of Conduct as part of its supplier onboarding process.

We reserve the right to carry out due-diligence to determine the risk associated with parties within our supply chain.

The Year Ahead

We believe that Helical has robust policies and procedures in place to safeguard our entire business, including supply chains, from slavery and human trafficking. In line with our culture to strive for continued improvement in all areas of our business, we will continue to seek opportunities to enhance our controls environment and reduce the risk of slavery and human trafficking in our operations and supply chains. We will proactively monitor and respond to emerging risks during the year.

During the financial year to 31 March 2020, Helical will continue to encourage the inclusion of a right of audit clause in all commercial contracts with suppliers and contractors. This approach will support the Company's ability to conduct audits with specific focus on modern slavery and human trafficking prevention mechanisms.

Approved by the Executive Committee on 25 November 2019 and signed on its behalf by:

A handwritten signature in blue ink that reads "Gerald Kaye". Below the signature is a horizontal line with a small mark at the end, likely a flourish or a checkmark.

Gerald Kaye
Chief Executive
Helical plc