



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

This statement sets out Mizen Properties Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains, insofar as that is practicable. This statement relates to policy, actions and activities during the financial year 1 January 2018 to 31 December 2018.

As part of the Construction and Property Development Sector, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring, insofar as it is practicable, that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Mizen Group Co. viz: Mizen Properties Ltd and subsidiaries including Mizen Design Build Ltd., which is the Design and Construction arm of the group.

Mizen provides a full range of property development and construction capabilities, which include:

- Land acquisition and Planning services (Greenfield and Brownfield)
- Project Design and Build packages
- Urban mixed-use regeneration
- Specialist / Bespoke commercial and medical fit out packages
- Property Consultancy

The nature of its Supply Chain is:

- Largely sub-contracted with respect to Professional Consulting, Construction and Procurement of services and materials.

Countries of operation and supply

The Company currently operates in the following countries:

- United Kingdom

The Company will be alert to assess whether or not particular activities or employment practices imply potential risk of slavery or human trafficking.

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- **Policies:** The Human Resources department is responsible for the development of policy, this being the current policy, and any necessary alterations to the same which is then approved by the Senior Management Team, before being communicated to staff and relevant suppliers.
- **Risk Evaluation:** Responsibility for monitoring human rights and reviewing slavery risk is managed by the Senior Management Team.
- **Investigations/due diligence:** The Operations, Finance and Human Resources Departments are responsible for appropriate investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** All employees are required to familiarise themselves with this statement and with the Modern Slavery Awareness and Victim Identification Guidance. This is available on the Company's HR System.

Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can make confidential contact with line managers and or senior management.
- **Employee code of conduct:** The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Procurement code of conduct:** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy:** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Wellbeing Policy:** The Company has a comprehensive policy in respect of all employees' wellbeing, at every level in the business.

Due Diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- mapping and reviewing the supply chain broadly and regularly to assess geographical risk of modern slavery and human trafficking;
- conducting supplier audits or assessments in which the mapping and review identifies a focus on eliminating slavery and human trafficking;
- taking steps to improve evident substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans if necessary; and
- invoking sanctions against suppliers that evidently fail to improve their performance or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company will:

- include a system for supply chain verification, whereby the Company evaluates potential suppliers before they enter the supply chain; and
- review its existing supply chains to similar purpose.

Training

The Company's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company;
- what external help is available, for example through the Modern Slavery Helpline, Gang-masters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

Awareness-raising programme

As well as training staff, the Company has raised awareness of modern slavery issues by posting this policy on the Company's CRM system, PeopleHR

The information explains to staff:

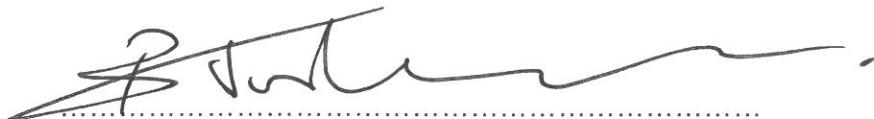
- the basic principles of the Modern Slavery Act 2015;

- how employees can identify and report slavery and human trafficking; and
- what external help is available, for example through the Modern Slavery Helpline.

Approval

This statement was approved on 4th April 2019 by the Company's board of directors, who review and update it annually, if necessary.

[Director's/Designated Member's] signature:

A handwritten signature in black ink, appearing to read "B. Tansey". It is written in a cursive style with a long horizontal line extending to the right.

[Bernard Tansey, Chairman]

Date: 4th April 2019