

* * * Modern Slavery Statement * * *

This is a Modern Slavery Statement by Sirius Real Estate Limited (“SRE”) and its subsidiary undertakings (“Sirius” or the “Group”).

Our purpose is to ‘Empower business and unlock potential’. This includes acting in an ethical manner and treating people well throughout our business. We recognise that the repugnant practice of modern slavery is a reality in all societies, and that no business can assume it is insulated from its reach no matter how reputable the business.

We are committed to identifying and tackling the potential exploitation of vulnerable workers within the Group and our supply chain. We have adopted a risk-based approach and continually assess the adequacy of our anti-slavery measures to provide assurance that we are leveraging our influence to the greatest effect, where it is needed most. Since the introduction of our first Modern Slavery Statement in 2020, we have found no instances of modern slavery within the Group or across our supply chain.

SRE is now subject to the UK Modern Slavery Act 2015, having acquired BizSpace the UK in November 2021. This statement sets out how the Group is proactively taking steps to address the risk of slavery and human trafficking within the business and across our supply chain during the financial year 2023 and has been approved by the SRE Board of Directors on 25 March 2022.

A handwritten signature in black ink, appearing to read "A Coombs", written over a horizontal line.

Andrew Coombs

Chief Executive Officer

31 March 2022

About Sirius

Sirius is the leading operator of branded business parks providing flexible workspace to the German and the SME market.

SRE is incorporated in Guernsey. The Group's business is conducted predominantly in Germany and partly in the UK, while certain management and administrative activities take place in other European countries.

Our supply chain and the associated modern slavery risk is described below. While we assess this risk on the basis of the complete supply chain from raw materials to delivery, our programme focuses on first-tier suppliers of products and services to the Group.

Products and Services Received	Location	Risk
Architectural design and related project management services	Germany, UK	Low
Building refurbishment services and materials	Germany, UK	Medium
Building maintenance and facilities management services	Germany, UK	Low
Office equipment and consumables	Germany, UK and The Netherlands	Medium
Short-term office space	Germany, UK and The Netherlands	Low
Catering and cleaning services	Germany, UK	Medium
Utilities (direct supply only)	Germany	Low

We also outsource certain administrative functions and receive professional advisory services in several countries. We consider all these suppliers to be low risk.

Application

This declaration applies to all members of the Sirius Group, including all Dutch, UK, Cypriot and German subsidiaries, in particular: Sirius Real Estate Ltd, Sirius Facilities GmbH, BizSpace Ltd, BizSpace II Ltd, M25 Business Centres Ltd, Curris Facilities & Utilities Management GmbH, LB2 Catering and Services GmbH, DDS Conferencing and Catering GmbH and SFG Nova Construction and Services GmbH. This declaration also applies to all individuals working for or on behalf of the Sirius Group at all levels, i.e. directors, employees, contractors, volunteers, seconded staff, agents and intermediaries.

Risk-based approach

There are two main sources of risk to our business which we seek to address through this Modern Slavery Statement:

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The supply of products or materials – products or materials which have been produced overseas wholly or in part using bonded or forced labour. Where a risk to our business exists, we consider it is most likely to arise from the supply of specific building materials made in particular high-risk countries. We use reputable sources of information to help guide our risk assessments relating to these products and materials, such as Verité and the Global Slavery Index.

The supply of labour - services supplied in-country using slave or trafficked labour. We consider the sectors which carry a medium risk or higher are characterised by the following risk factors within the context of our business:

Risk Factor	Examples
Vulnerable people groups	Refugees. Low skilled/education workers. Workers with disabilities. Younger workers. Workers from institutionalised backgrounds. Homeless workers.
Business models which use higher-risk practices	Migrant labour. Short-term labour, including the gig economy. Excessive overtime. Workers paid in cash. Workers dependent for personal needs such as accommodation.
Higher risk geographies	Workers from Eastern Europe, the Far East and Africa.

Based on these risk factors, we consider the sectors which may carry a risk to our business are most likely to be connected with building construction, catering and cleaning.

How we are dealing with risk

Code of Conduct

We have updated the Group’s Code of Conduct which is an integral part of the employment contracts of all of our employees, so that Sirius’s Modern Slavery policies and procedures bind all employees, breach of which leads to disciplinary action. We also have in place a whistle-blowing policy to ensure that an employee who reports concerns about modern slavery will not be discriminated against or victimised. There have been no reports received to date.

Sirius has in place recruitment and selection policies and procedures embedded across the business to eliminate the possibility of Modern Slavery taking place against any individual employee. In addition, Sirius’s pay policies ensure that all employees are paid fairly and that pay is set at a higher level than the applicable statutory minimum payable.

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Awareness and training

We share this Modern Slavery Statement with our staff, agents and key suppliers once a year. Those staff and agents who are more involved in procurement and contract monitoring receive modern slavery training every two years. In addition, all new starters receive training on modern slavery.

During the Covid-19 pandemic our training takes place remotely via videoconference. The modules cover the relevant legal situation, including criminal law provisions, using various example cases from practice, as well as the internal process for appropriately dealing with potential violations and the consequences thereof. Training is provided in German, although English is also available.

In the spirit of wider awareness and education, we seek to engage in collaborative relationships with our suppliers, where mutual concerns over modern slavery are openly discussed and, where necessary, addressed constructively.

Due diligence

Sirius follows a preventive risk-based approach to avoid bribery or corruption in relation to its business relationships with vendors, suppliers, consultants, service providers, contractors, subcontractors, etc. (hereinafter "Business Partners"). Sirius follows a preventive risk-based approach. This means that, depending on the classification as low, medium or high risk (risk assessment) with regard to the possibility of a bribery or corruption offence being realised, due diligence is exercised in accordance with the respective risk, which ensures that the entire business relationship with the Business Partner complies with applicable law.

As part of our risk assessment, we identify factors associated with the business partner that may create, increase or reduce risk. The basis of our risk assessment can be the personal meeting, the on-site visit, the obtaining of information from specialised databases about the Business Partner and its principals, and the commissioning of experts to perform additional due diligence. Further criteria of our risk assessment are, for example, the location of the Business Partner, the type of service and the type and number of subcontractors and their registered offices, as well as the contractual guarantee of integrity and anti-corruption standards.

If the risk assessment reveals an unacceptable risk, a business relationship is not established. The risk assessment does not only concern future Business Partners, but also covers existing business relationships.

The best possible implementation of our risk assessment also includes ensuring that our employees are appropriately trained and sensitised

Terms of Business

Some of our suppliers are large multinationals where we are expected to contract on their standard terms. In these instances, we still seek to apply our limited influence by promoting this Modern Slavery Statement to them.

For all contracts based on our terms of business, we include standard clauses on anti-slavery and human trafficking. Should we have a particular concern, these clauses include the right to insist on a compliance audit or if we find a violation, the clauses include the right to terminate the contract.

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Spot checks

For many of our suppliers, it is quite easy for us to carry out spot checks of their activities on site while conducting normal oversight. Where an employee or one of our agents has a concern about a supplier, they are required, in accordance with the Sirius Code of Conduct, to notify the appropriate manager.

Monitoring and effectiveness review

Our anti-slavery programme is overseen by the Chief Executive Officer and is kept under review by the Sustainability and Ethics Committee.

We carry out an annual review of the effectiveness of this Statement and the various measures we take to minimise the exposure of our business to modern slavery. We do this primarily by carrying out selective post-procurement and incident report reviews for compliance with this Statement.

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