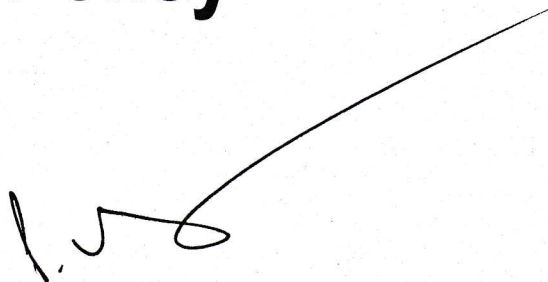


Anti-Slavery & Human Trafficking Policy



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Anti-Slavery and Human Trafficking Policy

Sonae UK Ltd operates an Anti-Slavery and Human Trafficking policy that reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

1.0 Modern Slavery and Human Trafficking

Modern slavery is the term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

2.0 Anti-Slavery Commitment

Sonae (UK) Ltd and its owners are fully committed to ensuring that the company complies with all applicable legal requirements including without limitation the Modern Slavery Act 2015.

Sonae (UK) Ltd and its owners have a zero tolerance to slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

3.0 Supply chain and Procurement

Sonae (UK) Ltd suite of standard form of contracts contains provisions which require suppliers and sub-contractors to comply with the Modern Slavery Act 2015 and also provide the company with right to audit suppliers and sub-contractors' compliance with this Act. Furthermore, such contracts provide the company with the right to ultimately terminate the agreement if the supplier or sub-contractor is found to have breached the Act.

The company internal procurement procedure requires its staff to comply with the Act at all times when undertaking procurement events and engaging with the supply chain. In addition, the company request that all our suppliers and sub-contractors confirm their compliance with our 'Supplier Code of Conduct' Identifying the minimum standards required to combat modern slavery and human trafficking.

Furthermore, the standard supplier selection questionnaire used by Achilles requires suppliers to confirm compliance with the Modern Slavery Act 2015 as a prerequisite to registration as an approved supplier pursuant to the Achilles UVDB (Utilities Vendor Database). The company would look to award any sub-contract orders to registered approved suppliers as a minimum requirement.

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4.0 Human Resources

All new and existing employees are subject to right to work checks so as to ensure that the company does not employ illegal workers thereby ensuring compliance with immigration, Asylum and Nationality Act 2006.

The company operates an employee code of conduct which requires its employees and others working on our behalf to uphold the company high standards of business integrity, honesty and transparency in all its business dealings. Employees are required to immediately report any possible breach of the code of conduct to their relevant line manager, Human Resources or a member of the Senior Management Team (SMT) via confidential whistle blowing procedures.

This Anti-Slavery and Human Trafficking Policy is a live document and will be reviewed on an annual basis at Management Review meetings.