

22 BISHOPSGATE (DEVCO) LIMITED

REGISTERED NUMBER: 09411165

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the period 1 January 2017 to 31 December 2017 (the financial year ended 31 December 2017).

Organisational structure

22 Bishopsgate (Devco) Limited is UK company registration number 09411165. We are a development company involved with a single development project at 22 Bishopsgate, London. We have no direct employees. The main activities of the company are outsourced to AXA Real Estate Investment Managers UK Limited under the terms of a Development and Asset Management Agreement.

Policies

We are committed to ensuring that there is no modern slavery and human trafficking in our supply chains or in any part of our business. We expect those we engage with to be similarly committed.

During the year our Board approved a specific policy relating to the Modern Slavery Act. We have implemented the policy and the policy has been distributed to the our key suppliers, including the main development contractor.

Areas of risk and steps taken to mitigate that risk

We engage others (predominantly based in the UK) to provide the services required to undertake our business activities in connection with the development at 22 Bishopsgate. This includes the planning and construction of the development and the marketing of the completed development.

We consider that our main area of risk in relation to slavery and human trafficking is within our construction supply chain and we took the following steps to mitigate that risk:

- our procurement processes include vetting new direct suppliers;
- we required our direct suppliers to comply with all local and national laws and our main contractor to ensure its supply chain does so and for our main contractor to alert us of any non-compliance within its supply chain.

Training

During 2017 specific training was provided on modern slavery and human trafficking for those involved in managing the company's affairs under the Development and Asset Management agreement.

This training was provided by a recognised legal firm, and the training was attended by key personnel from the our key suppliers, including the main development contractor.

Board approval

This statement has been approved by our board.

For and on behalf of 22 Bishopsgate (Devco) Limited

Signed *JAD*

Date..... *28. vi. 18*

H. BADHAM..... , Director