

# SLAVERY AND HUMAN TRAFFICKING STATEMENT 2019

This statement (“Statement”) pursuant to section 54 (1) of the UK Modern Slavery Act 2015 (MSA), sets out the steps we have taken during the period to 30 June 2019, as well as the activities we have started to progress, to prevent modern slavery and human trafficking in our business and our supply chains.

## ABOUT MAS

MAS Real Estate Inc (“MAS” or “the group”) is a commercial property investor, developer and operator listed on the main board of the Johannesburg Stock Exchange (“JSE”) and the Euro-MTF market of the Luxembourg Stock Exchange (“LuxSE”).

Acting with integrity is one of our core tenets and hence ethical sourcing and practices are fundamental to how we do business. MAS recognise that the current migrant crisis, along with other economic factors, has increased the risk, unwittingly or otherwise, of modern slavery, particularly in supply chains. MAS are committed to taking steps to reduce the risk of modern slavery and human trafficking in our business and in our supply chains.

## OUR PORTFOLIO

Established in 2008, MAS assembled, through acquisition and development, a high-quality portfolio of retail, office, industrial, logistics and hotel properties across Europe, with investment into CEE via two ventures with Prime Kapital Limited, a development venture (“PKM Developments”) and a co-investment venture focused on income generating assets.

Our portfolio includes real estate assets in the United Kingdom, Germany, Switzerland, Poland, Bulgaria and Romania.

## OUR TEAM

The group has employees and consultants based in the Isle of Man, United Kingdom and Germany. MAS operate robust recruitment practices, including equal opportunities and fair labour practices. Employees and consultants are office based professional individuals who are paid within market related pay ranges which are independently verified on a minimum biennial basis.

Policies, such as the Whistleblowing Policy, are in place to safeguard staff and are included within the Employee Handbook.

As such, we are confident that the risk within our employee base is extremely low.

## SUPPLY CHAIN

MAS believe that establishing long term relationships with trusted suppliers is one of the differentiating factors that underpins our business. Our supply chain consists of experienced asset and property managers who are engaged to manage the income generating assets, tenants, development contractors, and other professional and general service providers.

The group expect all suppliers to meet their obligations under employment legislation, to have robust recruitment protocols, to pay workers a fair wage and to have policies and practices in place to guard against slavery and human trafficking within their own supply chains.

MAS has recently finalised a Code of Ethics for suppliers and managing agents and is in the process of sharing this with our suppliers.

## RISK ASSESSMENT – Geographical

### United Kingdom, Germany and Switzerland

The United Kingdom and Germany, and Switzerland are reported as having a low risk of slave labour in accordance with the Global Slavery Index<sup>1</sup>. Hence, these jurisdictions are considered low risk.

### Central and Eastern Europe (CEE)

In accordance with the Global Slavery Index, Bulgaria, Romania and Poland are reported as having a higher risk of slave labour compared to the Western European countries in which MAS operates. Hence, these jurisdiction are considered high risk.

MAS’ joint venture partner, Prime Kapital, is a well-respected and experienced real estate investor and developer in CEE. They share our core values around integrity and are equally committed to guarding against slave labour and human trafficking in these markets.

Nova Park, currently our only asset in Poland, was the first shopping centre in Poland to receive a BREEAM In-Use Excellent certification. These certifications include aspects which incentivise responsible sourcing of construction materials, such as management of human rights in the production, transport and assembly of materials.

<sup>1</sup> Source: 2018 Global Slavery Index

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## RISK ASSESSMENT – Sector

### Construction

Construction is highlighted as a high-risk industry. MAS and its development partners select reputable, well known construction partners and conducts robust due diligence, prior to formalising any contractual relationship.

### SUPPLY CHAIN

**Code of Ethics** – A Supplier Code of Ethics and Conduct is in place and is circulated to key suppliers asking them to confirm compliance or highlight areas of non-compliance.

**Standard clauses for inclusion in contracts** – To the extent possible, standard clauses regarding safeguarding against modern slavery and human trafficking are included in new and renewal contracts. This includes a right to terminate contracts with any suppliers that do not comply with the contractual safeguards.

**Joint Venture (JV) arrangements** – Robust due diligence is conducted on our joint venture partners prior to the finalisation of any JV.

**Tenants** – The tenant profile is predominantly high calibre, household names and international brands and as such, we expect that tenants will have policies, procedures and protocols in place to ensure they are compliant with all relevant legislation and to safeguard their reputation.

**Property Managers, Asset Managers and Development Contractors** – MAS typically select “best in class”, industry respected, agents to act on our behalf. All agents are asked to confirm they have taken, and continue to monitor and implement, appropriate steps to reduce the risk of modern slavery and human trafficking within their business and supply chains.

**Professional service providers** – MAS partner with reputable, well known and highly respected professional firms where specialist expertise is required to support the business and as such, MAS expects that they will have similar policies, protocols and ethical standards to guard against modern slavery and human trafficking. In any event MAS will request that professional service providers comply with its Code of Ethics and Conduct to ensure compliance.

**General service providers** – these are typically local providers who are well known and respected within the community.

## POLICIES AND TRAINING

**MAS has a Whistleblowing Policy** which has been updated to include specific reference to modern slavery and human trafficking and how employees should act if they have any suspicions regarding modern slavery. Working with SeeHearSpeakUp, MAS recently introduced a whistleblowing hotline that provides a platform for anonymous reporting of any concerns or suspicions regarding modern slavery and human trafficking.

MAS operates under Director and Employees Codes of Ethics and Conduct and these, along with the Whistleblowing Policy, are included in the Employee handbook.

MAS's Asset Managers are primarily responsible for asset related supply chain management. They are aware of the risks of modern slavery and human trafficking and are able to identify potential vulnerable points within the supply chain.

Training is extended to the wider team to ensure overall appreciation of the risks MAS face and how we endeavour to minimise such risks.

## THE NEXT 12 MONTHS

MAS will continue to progress the actions detailed within this statement.

This statement was approved by the Board on 11 November 2019



**Werner Behrens**  
Chief Executive Officer