



**DATED: 21 May 2024**

**SUPERMARKET INCOME REIT PLC**

**MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT SUPERMARKET INCOME REIT PLC**

### **Introduction:**

Supermarket Income REIT plc (the “**Company**”) is a closed-ended investment company whose investment objective is to provide its shareholders with an attractive level of income together with the potential for capital growth by investing in a diversified portfolio of supermarket real estate assets in the U.K. The Company is the parent of a group of subsidiary companies (together, the “**Group**”) which own and hold the Company’s investments in supermarket real estate assets.

The Company is aware that its ability to manage the risks and opportunities of material environmental, social and governance (“**ESG**”) issues is fundamental to the delivery of long-term sustainable returns for its investors and that its activities and its method of delivery have the potential to impact on a broad range of stakeholders. It therefore intends to ensure that ESG considerations are reflected in all stages of the asset lifecycle and throughout its areas of operation.

The Company is committed to maintaining the highest standards of ethical behaviour and with integrity in all business relationships, and expects its business partners to do the same. The use of slavery (such as forced labour and child labour) and human trafficking is entirely incompatible with its ethics as a business and the Company believe that all efforts should be made to eliminate it from its supply chains and source responsibly.

The Company adheres to the AIC Code of Corporate Governance and works closely with its investment adviser, Atrato Capital Limited (the “**Investment Adviser**”) and other industry specialists to achieve the highest standards, and to counter direct and indirect support for slavery or human trafficking.

### **Modern Slavery and Trafficking Statement:**

The Company is committed to ensuring that it trades ethically, sources responsibly and that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

### **Organisation structure, business and supply chain:**

The Company seeks to achieve its investment objective by investing in supermarket property forming a key part of the future model of grocery. It is currently invested in a portfolio of supermarket property assets located in the United Kingdom and Europe with a total value of £1.77 billion as at 1 May 2024.

As is typical for an investment company, the Company does not directly employ staff. The other members of the Group also do not directly employ staff. The application of the

Modern Slavery Act is accordingly most relevant to the companies in the Company's supply chains, and to the Investment Adviser. The Board and the Investment Adviser recognise the Company's responsibilities to society in relation to the Company's supply chain. The Investment Adviser works collaboratively with the Company's business partners and seeks to ensure that its suppliers share the Company's values and comply with relevant legislation.

Key service providers in the Company's supply chain (which includes the Investment Adviser) also include those related to:

- Legal services
- Acquisition agency costs
- Property management
- Tax advisors
- Insurance providers
- Company secretary services
- Alternative investment fund manager services
- Auditing services
- Financial Advisors
- Valuers

None of these key service providers are located in countries that have a high prevalence of modern slavery as defined by the [Global Slavery Index](#).

**Policies and standards:**

The Board of the Company is responsible and accountable for the Company's modern slavery and human trafficking policies and strategies.

The Company's approach to ethical business is governed using a comprehensive framework of policies and standards. Key policies and standards relating to the Company's approach to mitigating risk of modern slavery and human trafficking include:

<b>Policy</b>	<b>Location</b>
Modern Slavery Statement (this document)	Available on the Company's website
Investment Policy and Restrictions	Our Investment Policy and Restrictions explain our investment strategy and demonstrate our risk-based approach to investment management.  The Policy and Restrictions are available on the Company's website.
Anti-Tax Evasion Policy	Our Anti-Tax Evasion Policy demonstrates our zero-tolerance approach to all forms of tax evasion and our commitment to acting professionally, fairly and with integrity in all our business dealings and relationships.  The Policy is available on the Company's website.
Whistleblowing Policy	Our Whistleblowing Policy demonstrates our commitment to a culture of

	<p>openness and identifying and addressing any suspected malpractice within the Group.</p> <p>The Policy is available on the Company's website.</p>
Anti-Bribery Policy	<p>Our Anti-Bribery Policy demonstrates our zero-tolerance position towards bribery and corruption and our commitment to operating fairly, honestly and openly in accordance with the laws of each jurisdiction within which we operate.</p> <p>The Policy is available on the Company's website.</p>
Environmental Policy	<p>Our Environmental Policy demonstrates the Company's belief in its responsibility to make a positive impact on the communities and industries in which it is active and its commitment to strong environmental governance and compliance with relevant environmental legislation.</p> <p>The Policy is available on the Company's website.</p>
Conflicts of Interest Policy	Available on the Company's website
Remuneration Policy	Available on the Company's website

**Due diligence processes for modern slavery and human trafficking:**

The Company has a zero-tolerance approach to slavery and human trafficking and is committed to ensuring its business partners operate with the same values. The Investment Adviser undertakes a detailed due diligence exercise in respect of each investment opportunity which progresses beyond its initial screening phase, including, an assessment of ESG risks. No investment opportunity is progressed if there is an identified risk of modern slavery (such as forced labour or child labour) or human trafficking including those risks as they are associated with the supply chain.

**Risk assessment and management:**

We believe that our suppliers should be working to ensure modern slavery does not occur. If the Company discovered that one of its suppliers was accepting of modern slavery or human trafficking in its business or supply chain it would engage with the business to seek to remove such practices from their business and, if necessary, terminate its arrangement with that supplier at the earliest opportunity.

The Investment Adviser is responsible for monitoring companies providing operational services to the Company's portfolio of assets and ongoing implementation of the Company's policies and standards. In this capacity, the Investment Adviser reports to directly to the Board and is required to escalate any material breaches of the ESG Policy.

**Application and effectiveness:**

The Company remains committed to the prevention of modern slavery and upholding the commitments set out in this statement. The Company's commitment is guided by the principles in the Modern Slavery Act 2015 within the UK and associated global initiatives such as the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and the OECD Due Diligence Guidance for Responsible Business Conduct. The Company's policies, standards and processes will continue to evolve in this area as progress is made.

**Training:**

As part of the Company's commitment to further developing its due diligence mechanisms to identify, prevent and mitigate human rights impacts across its operations and, where possible, its supply chain, training requirements relating to Company's Investment Adviser will be reviewed over the coming year.

---

This statement relates to Supermarket Income REIT plc.

This statement, which is made pursuant to section 54 of the Modern Slavery Act 2015, was approved by the Board of Supermarket Income REIT plc and constitutes the Company's slavery and human trafficking statement for the year ending 30 June 2024.

**Signed by:**

**Nick Hewson**

Chair

21/05/2024