

WAREHOUSE REIT

MODERN SLAVERY STATEMENT



We have a zero-tolerance approach to modern slavery and are committed to strengthening our processes and systems to minimise the risk of human rights infringements in our supply chain whether contracted to us directly or indirectly.

This is Warehouse REIT’s second annual statement relating to Modern Slavery which is made pursuant to The Modern Slavery Act 2015 (“the Act”) and covers the reporting period of 1 April 2021 to 31 March 2022. We provide a description of our business activities and the procedures and policies the REIT will endeavour to put in place to mitigate the risk of and prevent modern slavery and human trafficking within our business and any of our current and future supply chains.

The statement includes the following information:

1. The organisation’s structure, its business and its supply chains;
2. Its policies in relation to slavery and human trafficking;
3. Its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
4. The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
5. Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains; and
6. The training about slavery and human trafficking available to its staff.

About Warehouse REIT plc

The REIT is an AIM-listed REIT specialising in the UK warehouse sector supported by a third party, Tilstone Partners Ltd (“Tilstone”) who bring a high level of experience, operational expertise and market knowledge. At the year end to 31 March 2021, the REIT announced a portfolio valuation of £792.8 million and £43.0 million of contracted rent, all located within the UK.

Our assets are a mixture of single-tenant and multi-let warehouses. Tilstone manages these properties under a long-term contract with a fee dependent on the net value of assets under management. A small proportion of our assets, again within the UK, comprises offices and are non-core in nature having typically entered the estate as part of portfolio acquisitions. Our intention is to dispose of these as and when commercially practicable, as our focus is the warehousing sector.

The majority of the REIT’s expenditure relates to property management, capital expenditure within the estate and other third-party advisors including legal firms, accountancy services, financial advisors, PR agencies and company secretarial services. The sourcing of appropriate professional services and support is overseen by Tilstone.

Further information on Warehouse REIT plc can be obtained at www.warehousereit.co.uk

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Mission

The REIT's board is committed to the highest standards of ethical behaviour and expects no less of our suppliers whether contracted to us directly or indirectly. Any form of exploitation, use of slavery, and human trafficking is unacceptable and incompatible with our business ethics. We strongly believe that all efforts should be made to eliminate it from supply chains.

The REIT's supply chain consists of:

- property managers;
- professional advisors and consultants; and
- sub-contractors who carry out works that include labour, plant and purchasing materials on behalf of the REIT.

The REIT's policies in relation to slavery and human trafficking

The REIT is committed to reducing the risk of modern slavery or human trafficking in all parts of its business and will engage with its supply chain to ensure that its suppliers are adopting similar policies and mitigating their own risks.

In particular, the REIT's commitment to modern slavery is to:

- comply with legislation and regulatory requirements;
- make its supply chain aware that we promote the requirements of the legislation;
- consider the risk of modern slavery when making procurement decisions;
- develop awareness across the business of modern slavery issues;
- incorporate modern slavery conditions into tender and contract documents; and
- encourage its supply chain to take its own action to prevent modern slavery.

The REIT's due diligence processes in relation to slavery and human trafficking in its business and supply chains

As asset manager, Tilstone maintains the internal controls and systems to manage and mitigate the risk of human slavery and human trafficking within the REIT and its supply chains.

The objectives are to work towards:

- embedding the Modern Slavery Act into business risk management process; and
- risk assessing and performing due diligence of both existing and new high-risk suppliers.

We will assess the effectiveness of these actions at board level as part of our governance responsibilities.

The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk

While we are aware that the real estate and building sectors are highly ranked in terms of Modern Slavery risk, all of our suppliers are third party professional services entities based in the United Kingdom. Where appointments are made indirectly, through our Property Managers, this is from a preferred supplier list that pre-selects suppliers for their high-quality service with a proven track record. We, therefore, consider there to be a low risk of modern slavery and human trafficking

In relation to direct risk of slavery and trafficking on our sites, we have provided training on modern slavery to the Tilstone team, ensuring staff responsible for recruitment are or will (in the case of new starters) be trained to be aware of issues around third-party labour exploitation and signs to look out for. We will also encourage all colleagues to report cases of potential hidden third-party labour exploitation.

In relation to the business as a whole, we shall continue to

- ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members;
- adopt a proactive approach to reporting suspicions of possible hidden worker exploitation to the relevant authorities;
- consider favourably those labour providers and other organisations in the labour supply chain who adopt policies and procedures consistent with the above; and
- ensure that our higher-risk suppliers adhere to the key components of the Act.

The REIT will monitor the performance of all members of its supply chain deemed high risk on a continuing basis.

In addition to the actions described above, Tilstone will regularly review the effectiveness of the steps taken to eliminate these risks. We also intend to ensure that our tenants are aware of our policies and procedures, and our lack of tolerance of any shortfall in behavioural standards.

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The REIT strongly believes that the measures it has put in place and plans to implement during the year will mitigate the chance of slavery and human trafficking in our workplace now and in the future

These include:

- the risk of a breach of regulation under the Modern Slavery Act has been added to our Risk Register and is integrated into our risk management procedures;
- all suppliers with >£100k spend during the financial year have a Modern Slavery Statement with one exception. The exception has provided assurance that they adhere to the Modern Slavery Act 2015; and
- we have integrated a formal Contractor Checklist into our appointment process and are working with our Property Managers (who appoint suppliers on our behalf) to integrate the requirements into their appointment procedures. The checklist requires all high-risk suppliers, such as building contractors, and significant suppliers to have a Modern Slavery Statement or provide assurance of adherence to the requirements of the Modern Slavery Act 2015.

Training - modern slavery and human trafficking

The REIT provided mandatory eLearning on Modern Slavery to those members of the Board that had not already received training and similarly to the Tilstone team. The training module provided an overview of forced labour, slavery and human trafficking in supply chains. It explained the wider issue of modern slavery, identified potential risk areas for individuals and companies and informed staff of modern slavery red flags and how to respond when aware of these red flags.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Warehouse REIT plc's slavery and human trafficking statement at the financial year ending 31 March 2021.

Our commitment to this and our work will continue in 2021 and into 2022.

Neil Kirton

Chairman

For and on behalf of Warehouse REIT plc

Dated: 31 March 2021