

Modern Slavery Statement

Hibernia Real Estate Group Limited (“Hibernia”) is committed to preventing slavery and human trafficking and has clear guidelines and policies in this regard. The principal statutory source of modern slavery legislation in Ireland is primarily the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013.

Our policy is to manage our business in an honest, open and ethical way and to comply with all applicable laws and legislation.

We are committed to acting professionally and with integrity in all our business dealings and relationships. Our objective is to ensure that neither modern slavery nor human trafficking is taking place in any part of our business or supply chain. We have a zero-tolerance policy in relation to any violations of anti-slavery and human trafficking laws.

Employees

The risk of slavery and human trafficking in our recruitment process is negligible as our investment property portfolio is located entirely in Dublin and our employees are all office-based professionals.

All employees complete an induction process to ensure they understand our business, its culture and values. All employees are given details on Hibernia’s policies and procedures including those on modern slavery, health & safety, anti-bribery and corruption, whistleblowing, anti-bullying and harassment. These are provided through the employee handbook, training and periodic information issued by Hibernia.

All employees are encouraged to report any concerns in relation to modern slavery or human trafficking to the Risk & Compliance Officer, who will review the circumstances and decide on an appropriate course of action.

Suppliers

Our supply chain includes, inter alia, construction contractors, sub-contractors, material suppliers, cleaning and security companies and professional service providers. The majority of our suppliers are mainly confined to Ireland and in developed industries and therefore we believe they have a low risk of modern-day slavery.

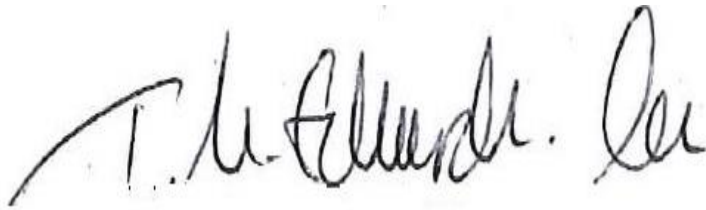
All development contractors are required to register with the Considerate Constructors Scheme (CCS), which commits those sites, companies and suppliers registered with the Scheme to encourage best practices in areas including community, environment, safety and workforce.

We have clear standards and principles for our suppliers which are set out in our Supplier Code of Conduct and supplier outsourcing contracts. This Code covers key economic, social and environmental issues and risks that we believe are of high importance to our business and sets out the minimum standards expected of our suppliers who are required to comply with the Code. We expect our suppliers to report any breaches that may arise and to highlight and report any concerns they may have in relation to slavery and human trafficking.

Summary

We consider Hibernia to be at a low risk of modern slavery given our employment practices, office location, concentration of investment portfolio, Supplier Code of Conduct and supplier outsourcing contracts in place. Hibernia will respond effectively to any potential issues that may arise and will ensure that Hibernia's modern slavery policy is reviewed periodically.

Signed:

A handwritten signature in black ink, appearing to read 'T. Edwards-Moss', written in a cursive style.

Thomas Edwards-Moss
Chief Executive
8th September 2022