



## Modern Slavery Act Statement

This statement is made on behalf of Picton Property Income Limited and its subsidiaries ('Picton', or the 'Group'), pursuant to Section 54 of the Modern Slavery Act 2015 (the 'Act') and constitutes Picton's slavery and human trafficking ("modern slavery") statement for the year ended 31 March 2024.

### Our Business

Picton is a UK Real Estate Investment Trust established in 2005. It owns and actively manages a diversified portfolio of UK commercial property, comprising 48 assets and with around 350 occupiers. Picton is listed on the main market of the London Stock Exchange. For the year ended 31 March 2024 Picton had revenue of £55 million and employed an average of eleven people.

### Our Supply Chain

Our supply chain consists of suppliers directly and indirectly engaged to manage the properties owned by the Group and professional services providers, including chartered surveyors, lawyers, accountants and other advisors. The majority of our direct suppliers are based in the UK, and we generally consider the risk of exposure to modern slavery to be low. However, we recognise that modern slavery does occur in the UK, particularly in sectors where, for example, there are higher numbers of migrant workers.

We are committed to managing this risk, particularly in relation to our property management supply chain. We employ an RCIS accredited property manager to manage our buildings. They issue an annual Modern Slavery and Human Trafficking statement in which their own policies on Modern Slavery and Human Trafficking are stated, and their own Supplier Code of Conduct contains specific sections on Modern Slavery. All suppliers employed by our property manager to provide property management related services are required to comply with their Supplier Code of Conduct including its provisions on Modern Slavery.

### Our Policies

We have in place a framework for conducting business across the Group, in a way that seeks to ensure that we make a positive contribution to society, whilst minimising any negative impact on people and the environment. Our policies and procedures applicable to our employees, suppliers and occupiers are described in more detail below.

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. We expect high ethical standards within our business and similarly from our suppliers.

Our Responsibility Committee reviews and monitors compliance with all relevant legislation and makes recommendations regarding our responsible conduct of business.

### Our Approach

#### **Employees**

We have a small team which is based in one location in the UK. All of our employees have employment contracts and receive a fair remuneration package, including pension contributions and market benefits. We undertake an annual employee satisfaction survey, the results of which are disclosed in our Annual Report. For the year to 31 March 2024 the satisfaction score was 86%.

We have a number of policies and procedures in place that promote a culture in line with the objectives of the Act. These are set out in our Employee Handbook, and include:

- Diversity
- Equal Opportunities
- Gifts, Inducements and Entertainment
- Harassment and Bullying
- Health and Safety
- Money laundering
- Staff Dealing
- Data Protection
- Whistleblowing

Training on modern slavery to raise awareness of relevant issues is provided for new employees as well as regular refreshers for existing team members.

### **Suppliers**

Almost all of our suppliers are based in the UK and the majority are assessed as low risk. We work with suppliers who share our commitment to taking appropriate steps to ensure modern slavery does not take place in our supply chain.

We have in place a Supplier Code of Conduct which sets out our social, ethical and environmental expectations of suppliers. We review our direct supplier base to assess the level of modern slavery risk posed by suppliers and completed our most recent review in September 2024.

We have also incorporated standard modern slavery clauses into our new contractual arrangements with certain suppliers which also refers to adherence to our Supplier Code of Conduct.

We will not purchase goods or services from any organisation that is found to be engaging in human trafficking or assisting slave labour.

### **Occupiers**

We have an occupier focused approach to the management of our portfolio and aim to develop close relationships with our occupiers. We have clauses in our standard leases that prohibit any activities that do not comply with statutory requirements, including the Act.

This statement was approved by the Board on 30 September 2024.

Michael Morris  
Chief Executive  
30 September 2024