

EQUITIX: ANTI-SLAVERY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Equitix's has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships; and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business.

Equitix's structure, business and supply chains

Equitix was established to develop, deliver and manage infrastructure projects from bidding and closing through to construction and service provision. Equitix is an integrated business with two platforms:

- bidding and project development; and
- fund and asset management.

Equitix's policies on slavery and human trafficking

As well as our Anti-Slavery Policy, Equitix has a number of existing practices which it believes to be relevant in the prevention of slavery and human trafficking. These include:

- compliance with anti-bribery regulation;
- compliance with anti-money laundering legislation; and
- a whistleblowing policy.

The above policies ensure that Equitix checks the sources of the funds it manages and the clients it takes on to ensure that Equitix is not used to launder the proceeds of criminal activity, which includes that obtained through human trafficking and the exploitation of slave labour. Additionally, Equitix encourages its staff to report any malpractice at the earliest possible stage.

The due diligence processes Equitix has undertaken with regard to the risk of slavery and human trafficking within its business and supply chains

Equitix's supply chain is limited as we do not produce, manufacture or retail any physical goods and therefore have no supply chain related to such activities. Equitix operates predominantly in the UK and Europe where the risk of slavery and human trafficking in its supply chain has been determined to be low.

Equitix, in pursuing primary development projects, does engage with construction, operations and facilities management contractors where the risk of slavery and human trafficking exists. Pursuant to Equitix's Anti-Slavery Policy, staff are required to undertake due diligence to confirm that any entity with whom Equitix engages in a business

relationship has an anti-slavery policy and controls in place to ensure compliance by its own staff and representatives. Where appropriate contractual documentation entered into with contractors, especially on primary projects, should include provisions requiring the counterparty to comply with applicable laws, rules and regulations relating to slavery and human trafficking.

Staff are required to familiarise themselves with the Anti-Slavery Policy and consider, in the performance of their responsibilities for Equitix, the possibility that parties with whom Equitix is dealing may be engaged in activities involving slavery of forced labour and to raise any concerns to the Compliance Officer immediately.

How Equitix measures that slavery and human trafficking has not taken / is not taking place in its business or supply chains

By publishing this anti-slavery statement on our website, we are demonstrating that Equitix has a zero tolerance policy to slavery and human trafficking. We expect all with whom we do business to comply with our values and ethics. Staff are required to undertake due diligence to ensure that parties with whom we do business have an anti-slavery policy in place and, on a risk assessed basis, to undertake further due diligence to satisfy themselves that the party complies with such policy.

Staff training

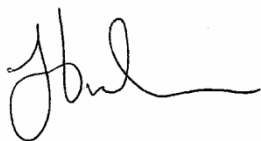
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we will be providing training to our staff over the course of the year.

Continued commitment to anti-slavery policy

This policy statement and the risk profile of Equitix's business will be reviewed annually and published on the website pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2019.

This statement was approved by the Equitix Holdings Ltd Board of Directors on 28 January 2019.

For and on behalf of Equitix Holdings Ltd:



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Geoffrey Jackson
Chief Executive Officer
9 April 2019