

## Slavery and Human Trafficking Statement

### 1. Introduction

This statement is made by SEGRO plc (SEGRO). It is a statement made in accordance with section 54 of the Modern Slavery Act 2015 (the MSA) and covers the financial year from 1 January 2018 to 31 December 2018 (the Financial Year). It sets out the steps taken by SEGRO and the subsidiaries set out below, during the Financial Year, to prevent modern slavery and human trafficking occurring in its business and supply chains.

This statement is also made on behalf of the following subsidiaries of SEGRO:-

- Slough Trading Estate Limited
- SEGRO Administration Limited
- Airport Property Partnership

At SEGRO we know that acting responsibly is the right thing to do. As a business we recognise our responsibility to be aware of the risks of slavery and human trafficking within our own organisation and supply chain.

### 2. Background and Supply Chain

SEGRO is a leading owner, asset manager and developer of modern warehousing and industrial properties, with £11 billion of assets under management (£9.4 billion including joint ventures at share) as at 31 December 2018. It is a Real Estate Investment Trust (REIT) listed on the London Stock Exchange.

The portfolio comprises modern, generic warehouses located close to major population centres and transport hubs in the UK and in selected countries in Continental Europe.

To find out more about what we do, please go to <http://www.segro.com>

SEGRO outsources all building related services across the group. SEGRO has suppliers based in eleven different European countries, with the core focus on construction, cleaning and security.

### 3. Slavery and trafficking policies

SEGRO published its first Modern Slavery statement in May 2017, with a second following in May 2018. In the past year we have remained focused on our work on modern slavery and human trafficking to ensure that we continue to have in place effective and appropriate responses to the risk that modern slavery presents.

To further SEGRO's commitment to combating slavery and trafficking, during the Financial Year we have reviewed the following policies which set out our zero tolerance approach to modern slavery both within our own operations and our supply chain to ensure that they remain appropriate:

- Anti-Slavery and Human Trafficking Policy (a copy of our policy can be found here)
- Modern Slavery and Labour Standards Supplier Code (a copy of this code can be found here)
- Code of Ethics which incorporates our Serious Concerns Policy
- Procurement Policy

Elizabeth Blease remains our modern slavery champion and has taken steps to ensure that our policies remain appropriate, used, and understood by employees and that we operate in accordance with them. She will continue to facilitate this work throughout 2019.

Our Serious Concerns Policy is published on our intranet and if there are any concerns relating to modern slavery or trafficking they can be raised in confidence without fear as part of our reporting procedure. All reports of modern slavery will be fully investigated, and any appropriate remedial actions taken.

#### **4. Risk assessment processes**

Reflecting the United Nations Guiding Principles on Business and Human Rights, (UNGP's) our due diligence activities to combat slavery and trafficking are risk based and will continue to correspond with the level of risk identified.

During the Financial Year, we considered the risk of modern slavery in our own operations and continue to conclude that, on the basis that we are a UK employer subject to UK employment protections and practices and already have well developed checks and balances within our business, we continue to have a low risk of modern slavery occurring in our own operations. To ensure that the risk remains low, we continue to communicate our zero tolerance approach to slavery and human trafficking and our policies on it, throughout our business. Our HR team and the recruitment agencies that we use, are aware of our stance on this and are mindful of it when selecting new employees to join SEGRO.

We ensure that our applicable suppliers are aware of our approach to modern slavery and human trafficking to help prevent it occurring in our supply chain. In addition, the General Counsel and Legal Counsel each visited a number of suppliers in both the UK and Continental Europe throughout 2018 to discuss their approach to modern slavery and human trafficking. We also determined that it continues to be necessary to ask all applicable new suppliers to make certain confirmations and provide information of the work that they carry out to ensure that modern slavery and human trafficking is not occurring in their own supply chains.

During the Financial Year we reviewed our policies and procedures to ensure that they continued to comply with SEGRO's obligations under the MSA. We are comfortable that they do. Refresher training was also given to key members of staff on anti-slavery and human trafficking.

#### **5. Due diligence processes**

In order to prevent slavery and trafficking in our business and supply chains, we carried out a due diligence process when the legislation was introduced which was detailed in our 2017 and 2018 statements.

We will continue to assess what further due diligence or other steps are required, which has included and may include in future:

- adjusting organisation/management/procurement and other systems and procedures;
- adjusting supplier vetting/screening processes;
- carrying out in person supplier audits or inspections;
- amending the contractual provisions that we have in place with suppliers;
- implementing supplier corrective action plans; and
- imposing sanctions on suppliers

We will continue to keep under review the need to undertake further risk assessment and due diligence activities.

#### **6. Ongoing effectiveness**

We will continue to monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, including monitoring the need for further action as we continue our risk assessment and due diligence activities and get responses from our key suppliers.

**Approved by the Board on 17 April 2019.**

**Signed by:**

This statement has been approved by the Board of Directors who will review and update it annually.



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Name **DAVID SLEATH**  
Director  
For and on behalf of SEGRO plc



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Name **ANDY GULLIFORD**  
Director  
For and on behalf of Slough Trading Estate Limited



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Name **DAVID SLEATH**  
Director  
For and on behalf of SEGRO Administration Limited



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Name **SIMON PURSEY**  
Director  
For and on behalf of Airport Property GP (No. 2) Limited as the general partner of Airport Property Partnership