

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 2016 to 31 December 2016 (the Financial Year).

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

- Slough Trading Estate 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.

During the Financial Year SEGRO carried out a review of its policies and procedures to ensure that they complied with SEGRO's obligations under the MSA.

2. Background and Supply Chain

SEGRO is a leading owner, asset manager and developer of modern warehousing and light industrial properties, with £8 billion of assets under management (£6.3 billion including joint ventures at share) as at 31 December 2016. 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

To further SEGRO's commitment to combating slavery and trafficking, we are taking steps to implement the following new policies which set out our zero tolerance approach to modern slavery both within our own operations and our supply chain:

- 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](#))

We are also working to build appropriate statements and modern slavery policy cross-referencing into the following pre-existing policies:

- Code of Ethics which incorporates our Serious Concerns Policy
- Procurement Policy

Elizabeth Blease has been appointed our modern slavery champion and will be working with key stakeholders within SEGRO to ensure that these policies are appropriate, used and understood by employees and that we operate in accordance with them.

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. Our Serious Concerns Policy has been modified to take account of the MSA. 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, described below, are risk based and will in future correspond with the level of risk identified.

We have considered the risk of modern slavery in our own operations and we have concluded 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 have a low risk of modern slavery occurring in our own operations.

We have determined that it is necessary to write to all our current suppliers as detailed below in order to recognise the risk and seek to prevent modern slavery occurring in our supply chain.

We have also determined that it is necessary to consider on a case by case basis what steps should be taken in relation to any new suppliers we engage with going forward.

5. Due diligence processes

In order to prevent slavery and trafficking in our business and supply chains, we have begun a due diligence process. This involves taking action to embed zero tolerance of modern slavery and trafficking. We have either undertaken or begun to take the following steps:

- Appointed a modern slavery champion as referenced above.
- Ensured that assessing modern slavery risks and taking steps to combat modern slavery is an item for periodic consideration by the Board and that any findings that raise material concerns from the due diligence processes are communicated to the Board and then acted upon.
- Taking steps with our current suppliers to, as appropriate:
 - write to them to set out our zero tolerance approach to modern slavery
 - require them to sign up to our Modern Slavery and Labour Standards Supplier Code; and
 - require them to complete supplier due diligence questionnaires.
- Identifying any appropriate steps with any new suppliers we engage with on a case by case basis.

We will use the responses from our suppliers to judge future actions and assess what further due diligence or other steps are required, which may include:

- adjusting organisation/management/procurement or 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
- imposing sanctions on suppliers

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

We are actively considering changing our third party contracts such that from the end of 2017/start of 2018 onwards where we enter into new contracts with third parties those contracts will include appropriate anti-modern slavery provisions.

6. Next Steps

In order to monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, we intend to carry out the following actions:

- During the 2017 financial year we intend that key members of staff within our procurement and HR teams will carry out the anti-slavery and trafficking training. Other members of staff will be given appropriate training as applicable.
- We will have issued our Anti-Slavery and Human Trafficking Policy to our workforce and carried out a communication exercise in relation to this policy.

- We will send out, to all our suppliers, correspondence:
 - explaining our zero tolerance approach to modern slavery;
 - asking them to confirm adherence to our Modern Slavery and Labour Standards Supplier Code; and
 - as appropriate asking them to complete our supplier due diligence questionnaire.
- As referenced above, we shall monitor and consider responses of those suppliers with whom we correspond on MSA issues and shall take a zero tolerance approach.

As referenced in this statement, we will monitor the need for further action to be taken and other key actions to be implemented as we continue our risk assessment and due diligence activities and get responses from our key suppliers.

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 Sketh*
Director
For and on behalf of SEGRO plc



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Name *Andrew Pilsworth*
Director
For and on behalf of Slough Trading Estate Limited



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

Approved by the Board on 22 March 2017.