



## Slavery and Human Trafficking Statement

### 1. Introduction

We know that acting responsibly and in the interests of our stakeholders is the right thing to do. We recognise our responsibility to make a positive contribution to our stakeholders and to wider society which includes being aware of the risks of slavery and human trafficking within our own organisation and supply chain, and ensuring that appropriate systems and controls are in place to prevent it from occurring.

This is the fourth statement made by SEGRO plc (SEGRO) in accordance with section 54 of the Modern Slavery Act 2015 (the MSA) and covers the financial year from 1 January 2019 to 31 December 2019 (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:-

- SEGRO Administration Limited
- SEGRO (EMG) Limited
- Slough Trading Estate Limited

### 2. Background and Supply Chain

SEGRO is a UK Real Estate Investment Trust (REIT) and listed on the London Stock Exchange in the FTSE 100 index. It is a leading owner, manager and developer of modern warehouses and light industrial property with a portfolio comprising 7.8 million square metres of space (84 million square feet), valued at £12.2 billion as at 31 December 2019 (£10.3 billion including joint ventures at share). Our assets are positioned strategically at locations in the UK across London and the South-East and Midlands regions, while in Continental Europe we have developments in France, Germany, Italy, Poland, Spain, The Netherlands and the Czech Republic.

For 100 years SEGRO has been creating the space that enables extraordinary things to happen. From modern big box warehouses, used primarily for regional, national and international distribution hubs, to urban warehousing located close to major population centres and business districts, we provide high-quality assets that allow our customers to thrive.

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

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

### 3. Slavery and trafficking policies

Modern slavery and human trafficking has no place in modern society, in our organisation or in our supply chain. SEGRO published its first Modern Slavery statement in May 2017 ([SEGRO Slavery and Human Trafficking Statement - May 2017](#)), with subsequent statements published in May 2018 ([SEGRO Slavery and Human Trafficking Statement - May 2018](#)) and May 2019 ([SEGRO Slavery and Human Trafficking Statement - May 2019](#)). In the past year we have continued our focus on modern slavery and human trafficking to ensure that we continue to have in place effective, robust and appropriate responses to the risk that modern slavery and human trafficking presents.

During the Financial Year we have reviewed the following policies which set out our zero tolerance approach to modern slavery and human trafficking 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 [SEGRO Anti-Slavery and Human Trafficking Policy](#))
- Modern Slavery and Labour Standards Supplier Code (a copy of this code can be found here [SEGRO Modern Slavery and Labour Standards Supplier Code](#))
- Code of Ethics which incorporates our Serious Concerns Policy
- Procurement Policy

Elizabeth Blease remains our modern slavery champion, and has put in place procedures to ensure that our policies remain appropriate, used and understood by employees and that we operate in accordance with them. She will continue this work throughout 2020.

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 suppliers also have access to our confidential external third party whistle-blowing service to raise any concerns.

All reports of modern slavery will be fully investigated and any appropriate remedial actions taken.

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

Our 2019 Annual Report and Accounts ([SEGRO 2019 Annual Report and Accounts](#)) sets out SEGRO's approach to risk management which is designed to identify, evaluate and mitigate the significant risks that the Group faces. As well as reviewing external risks, the Board also monitors internal risks and ensures that appropriate controls are in place to manage them.

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 and human trafficking occurring in our own operations.

To ensure that the risk remains low, we continue to take a pro-active approach. We 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. Our business model is based on long-term ownership of our properties, which allows us to take a long-term approach to our business relationships, including those with our suppliers. This ensures that we have a mutual understanding with our suppliers about our stance on modern slavery and human trafficking, and gives us reassurance that they have all been subject to our thorough screening process.

In addition, the General Counsel and the Legal Counsel each visited a number of suppliers in both the UK and Continental Europe throughout 2019 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.



## **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 previous 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.

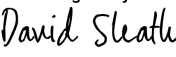
## **6. Ongoing effectiveness**

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.




**Signed by:**


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

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