

## 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 2017 to 31 December 2017 (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.
- 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 light industrial properties, with £9.3 billion of assets under management (£8.0 billion including joint ventures at share) as at 31 December 2017. 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, and in the past year we have remained focused on our work on modern slavery and human trafficking to ensure that we have in place effective and appropriate responses to the risk that modern slavery presents.

As reported in our previous statement, to further SEGRO's commitment to combating slavery and trafficking, during the Financial Year we implemented the following policies (which were approved at Director level) 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 also built 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

We issued our Anti-Slavery and Human Trafficking Policy to our workforce and carried out a communication exercise in relation to this 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 2018.

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 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 have communicated 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 wrote to all of our applicable suppliers during the Financial Year (as further detailed below) to ensure they were aware of our approach to modern slavery and human trafficking and to seek to prevent it occurring in our supply chain. We also determined that it was (and continues to be) necessary to ask all 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.

Training has been given to those key members of staff within our operations, procurement and HR teams on anti-slavery and human trafficking, based upon the risk assessment exercise carried out and will be refreshed during 2018. During the Financial Year we also 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 in 2016 and the first half of 2017. which involved taking action to embed zero tolerance of modern slavery and trafficking. We undertook 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.
- Took steps with our current applicable 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.
- Updated our third party contracts to include appropriate anti-modern slavery provisions for new contracts.
- Identified appropriate steps with new suppliers we engage with on a case by case basis, which includes requiring them to:
  - complete a supplier due diligence questionnaire; and
  - confirm that they will comply with our Modern Slavery and Labour Standards Supplier Code

We used and will continue to use the responses from our suppliers to judge future actions and 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

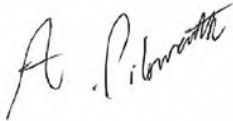
We will continue to monitor the effectiveness of the steps we have taken to stop slavery and trafficking taking place in our business and supply chains, including monitoring the need for further action as we continue our risk assessment and due diligence activities and get responses from our key suppliers.

### Signed by:

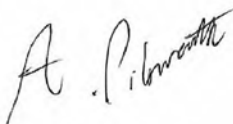
This statement has been approved by the board of directors who will review and update it annually.



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Name  
Director  
For and on behalf of SEGRO plc



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Name  
Director  
For and on behalf of Slough Trading Estate Limited



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Name  
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 18 April 2018.**