

Anti-slavery and human trafficking policy

1. Introduction

- 1.1 Conducting our business in an ethical and honest way is fundamental to how SEGRO operates. In line with this commitment, SEGRO strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain.
- 1.2 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.
- 1.3 At SEGRO, we are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

2. Policy Statement

- 2.1 We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
 - 2.1.1 We have a zero-tolerance approach to modern slavery in our organisation or our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
 - 2.1.2 We are committed to having a clear and transparent company statement, which is reviewed annually in compliance with the Modern Slavery Act 2015, voluntarily uploaded to the government's modern slavery statement registry and is communicated to our employees by being posted on our website. Our statement sets out the steps taken to prevent modern slavery and human trafficking and the effectiveness of those measures.
 - 2.1.3 As part of our contracting processes, we reserve the right to terminate our relationships with suppliers and other organisations working on our behalf if they do not comply with our Modern Slavery and Labour Standards Supplier Code. All suppliers, contractors or business partners of SEGRO are required to comply with the principles contained within our Modern Slavery and Labour Standards Supplier Code, which sets out our expectations for the treatment of workers and how suppliers are required to behave.
 - 2.1.4 Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with our Modern Slavery and Labour Standards Supplier Code. Suppliers engaging workers through a third party are also required to obtain third parties' agreement to adhere to the Modern Slavery and Labour Standards Supplier Code.

3. Policy Application

- 3.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.
- 3.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

4. Responsibility for the policy

- 4.1 The Company is committed to making available sufficient resources for its implementation and has overall responsibility for ensuring compliance. It is also committed to ensuring that employees understand and comply with this policy and to give adequate training on the issue of modern slavery in supply chains where appropriate.
- 4.2 The General Counsel has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

5. Reporting Modern Slavery

- 5.1 If any employee, or anyone working for SEGRO under any other type of contract has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must bring this to our attention in one of the ways set out below. All concerns must be raised in good faith, and every concern will be treated seriously and will be fully investigated.
- 5.2 In the first instance, employees should report to their line manager or HR manager. If the matter is extremely serious or if any employee feels it would not be appropriate to raise it with their line manager or HR manager, employees should following the reporting procedures set out at 5.3 below.
- 5.3 Any employee, contractor or other person working for SEGRO may report concerns to the General Counsel and the Group HR Director, or to Safecall, who can be contacted 24 hours a day from anywhere in the world on +44 800 915 1571. Further details may be found in our Serious Concerns Policy.
- 5.4 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on our employee intranet.

6. Breaches of this policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.