

HUMAN RIGHTS POLICY

About the SEGRO Group

SEGRO is a UK Real Estate Investment Trust (REIT), listed on the London Stock Exchange in the FTSE 100 index and Euronext Paris. We are a leading owner, asset manager and developer of modern warehousing and industrial property with a portfolio of assets which are positioned strategically at locations in the UK (primarily London, the South-East and Midlands regions) and in Continental Europe (Czech Republic, France, Germany, Italy, the Netherlands, Poland, and Spain).

SEGRO has been investing in high quality, sustainable buildings in prime locations since 1920, creating the space to enable extraordinary things to happen. We develop, own, rent and manage warehouse and industrial properties for our customers in the UK and Continental Europe. Our portfolio varies from modern big box warehouses, located in regional and national distribution hubs, to urban warehousing located in or close to major cities and around key transport hubs. More information on what we do can be found on our [website](#).

Introduction

Acting responsibly and in the interests of our wider stakeholders is core to what we do at SEGRO, and we recognise the importance of respecting and safeguarding human rights. SEGRO is committed to being a force for societal and environmental good, as articulated in [Responsible SEGRO](#).

We recognise that our business activities can have an impact on people's human rights, positively and negatively. This policy statement outlines our commitment to respect internationally recognised human rights and how we seek to mitigate adverse human rights outcomes from occurring across our value chain.

This policy is made on behalf of the SEGRO Group consisting of SEGRO plc and all subsidiaries. It applies to all people working for SEGRO, or on SEGRO's behalf, and requires them to act in a way that respects the human rights of colleagues, business partners, and the communities we impact. We seek to work with businesses and people who share our values, and we expect those we do business with, including contractors, suppliers, partners and customers, to meet their responsibility to respect human rights and to conduct their business in an ethical way.

This policy has been developed through cross functional input and in conjunction with a review of existing policies that relate to human rights as well as input from external human rights advisers. This policy will be communicated to all our employees and suppliers.

Our commitment to respect human rights

SEGRO at the very least seeks to comply with all applicable laws and regulations in the countries in which we operate. We are committed to respecting the internationally accepted human rights as set out in the Universal Declaration on Human Rights and labour rights as enshrined in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. This includes the four Core Labour Standards covering: freedom of association and the right to collective bargaining; the elimination of forced labour; the abolition of child labour; and the elimination of discrimination in respect of employment and occupation. We are also guided by the United Nations Guiding Principles on Business and Human Rights.

Our approach

Identification and review of emerging risks, including human rights risks, are integrated into our risk review process. Dynamic risk management is embedded in our culture and ensures that we are able to adapt to the ever-changing business environment. We have a process to identify and manage principal business risks, which may include human rights risks. The risk process is overseen by an Audit Committee which comprises independent Non-Executive Directors, while the SEGRO plc Board reviews the Group Risk Register.

We have identified the human rights that are most likely to have an impact throughout our business including on our employees, in our supply chain and in our communities. As such, these are the human rights which are our main focus in this policy.

We believe that the greatest risk of human rights abuse is likely to occur in our supply chains. We have identified sectors that present a higher level of risk, for example construction and so where appropriate we adapt our supplier screening for these sectors to reflect the increased risks. The supplier assurance process ensures that we are working with appropriate, competent and legally compliant suppliers and that these suppliers meet SEGRO's minimum requirements. We conduct periodic internal audits where we engage with our suppliers' senior management teams to discuss in more detail their compliance with our approach to issues such as bribery, corruption and modern slavery, including in their own supply chain.

We also recognise that there are human rights risks associated with the use of our sites and buildings. Serious health and safety breaches and illegal activities provide grounds for terminating customer leases.

Policies and compliance

SEGRO has the following policies:

- Our [Health and Safety Policy](#) ensures so far as is reasonably practicable, the health and safety of all SEGRO employees and any other persons who may be directly affected by our activities.
- Our **Mental Health and Wellbeing Policy** sets out SEGRO's commitment to raise the profile of mental health and wellbeing within the workplace.
- Our [Code of Business Conduct and Ethics](#) ("the Code") applies to all SEGRO employees and sets the standard for everyone to behave morally, and ethically consistent with our Purpose and Values. It contains our [Anti-Slavery and Human Trafficking Policy](#). Compliance with the Code is a condition of employment. The Code also requires that appropriate systems and controls are in place to ensure that all suppliers, partners, contractors, and others representing SEGRO behave legally and responsibly.
- Our [Modern Slavery and Labour Standards Supplier Code](#) ensures that suppliers share the same commitment as we do to mitigate modern slavery risks and uphold labour rights.
- Our **Procurement Policy** ensures that SEGRO is only working with appropriate, competent and legally compliant suppliers and sets out a strict supplier assurance process which enables us to be confident that our supply chain operates at a high standard.
- Our [Supplier Code of Conduct](#) further clarifies SEGRO's expectations on suppliers with respect to business conduct within their operations and, where applicable, their own supply chain. This supports us in ensuring that our supply chain is safe, secure and efficient.
- Our [Diversity and Inclusion Policy](#) sets out our intention to promote diversity and inclusion in SEGRO and to safeguard the right of all our employees to be treated fairly and respectfully within the workplace.

SEGRO's priority human rights

As mentioned above, set out below are the human rights which are our main focus.

1. Health and safety

Health and Safety is central to all of our business activities and we are committed to the prevention of harm to people in our operations and supply chains. It is our responsibility to ensure that we provide and promote a healthy, safe and secure environment in which our employees and customers can work, extending throughout our supply chain, and in particular on our existing sites and development projects.

Our general approach aims to establish healthy working environments, eliminate or control significant safety risks, develop appropriate health and safety procedures, ensure employees are given appropriate information and training to carry out their responsibilities, and to achieve compliance with legal requirements. Our approach covers both occupational Health and Safety, and the mental health and wellbeing of those that work for us. More information on our approach can be found in our [Health and Safety Policy](#), and Mental Health and Wellbeing Policy.

2. Modern slavery and labour rights

SEGRO prohibits the use of modern slavery in our operations and supply chain, and is committed to identifying and preventing all forms of modern slavery within our organisation and supply chains. Modern slavery encompasses, for example, servitude, forced and compulsory labour, bonded and child labour and human trafficking. We are also committed to mitigating against wider worker exploitation, and upholding labour rights in our supply chain.

Our [Anti-Slavery and Human Trafficking Policy](#) outlines the requirements for our employees to support and uphold our measures to safeguard against modern slavery. Our expectations on suppliers, including contractors and subcontractors, are outlined within our [Modern Slavery and Labour Standards Supplier Code](#) and referred to in our [Supplier Code of Conduct](#). These include more details on safeguarding against modern slavery and respecting labour rights more broadly, including those relating to vulnerable workers such as young people and migrant workers.

We communicate our approach to employees so they understand how to report concerns related to modern slavery and worker exploitation. Given the heightened risk of modern slavery associated with the construction sector, we have published posters at all of our sites, to help our people, and anyone else who attends our site, to spot the signs of modern slavery and know how to report concerns.

We believe that all workers deserve to be paid a fair wage that reflects their skills, experience and, importantly, the real cost of living in the country in which they are based. Ensuring a living wage rate is paid to workers throughout our supply chain reduces the likelihood that such workers will be victims of modern slavery. Our [Supplier Code of Conduct](#) outlines our expectations on suppliers, contractors and sub-contractors to pay its workers at least a rate that reflects the cost of living. In the UK, we are an accredited Living Wage employer.

We also know that responsible purchasing practices are important to prevent financial pressure on suppliers and enables them to comply with our standards and respect the human rights of their workers. We are committed to paying all our suppliers on time and fairly and, in the UK, we are a signatory to the UK Prompt Payment Code.

3. Discrimination

We want SEGRO to be a place where everyone can feel free to be themselves by creating a working environment which is inclusive, free from bias and has equal opportunities for all. We are committed to ensuring an inclusive and diverse workplace, and we expect our suppliers to share that commitment.

We have robust policies in place with regards to equal opportunities, supporting our belief that everyone deserves the right to be treated equally and should not be discriminated against because of their differences, such as age, gender, disability, ethnicity, gender identity and expression, religion or sexual orientation. The Group commits to: treat all employees equally on the basis of merit and ability to do the job without being improperly influenced by other factors; ensure equal opportunities in the areas of recruitment, selection, promotion, transfer, training, access to benefits and services, options for flexible working, redundancy, discipline, and dismissal; and to ensure employees work in an environment free from harassment, bullying, and other discrimination. In the UK, we are accredited by the National Equality Standard, the nationally accepted standard for inclusiveness and equality in business. We are also certified against the Global Equality Standard.

More information on our approach to Diversity and Inclusion can be found in our [Diversity and Inclusion Policy](#) as well as on our [website](#).

4. Impacts on our local communities

SEGRO is committed to contributing to the long-term vitality of the communities in which we operate. We recognise that our construction sites and estates have a positive impact on the local economy, supporting jobs creation and the growth of SMEs. However, we are mindful that if not well managed and maintained, our construction sites and estates can cause disruption for local communities. Through the construction phase we have processes that adhere to planning regulations to minimise and mitigate the impact of dust, light and noise originating from the site. We also have mechanisms in place to receive, acknowledge and resolve, where possible, grievances and concerns raised by members of the community.

As part of our [Responsible SEGRO](#) goals, we are working to implement Community Investment Plans covering every key market within our portfolio by 2025. We work in close consultation with local stakeholders including local authorities, reputable charities, and community groups to identify local needs and ensure we focus our resources where the need is greatest. Our priority areas include helping unemployed people into work, inspiring young people to reach their full potential, enabling SMEs to compete for supply chain opportunities and revitalising outdoor green spaces for communities to enjoy. We will work with customers and suppliers to identify and invest in the most effective opportunities to develop the skills local people need to secure meaningful employment and, with our contractors, create on-site training and job opportunities during the construction stage of our projects.

5. Grievance mechanisms and remedy

We have grievance and complaint mechanisms in place and are committed to providing remedy when we have caused or contributed to any human rights abuse.

If an employee or anyone else working for SEGRO has a reason to believe that any form of human rights abuse exists within our organisation or our supply chain, or may occur in the future, they are able to bring this to our attention. Concerns can be raised with our Group HR Director, Head of Legal or via Safecall, an independent third-party whistle-blowing hotline which can be contacted 24 hours a day from anywhere in the world. These concerns can be reported anonymously, and all issues raised will be fully investigated and treated seriously.

To ensure that suppliers and workers in our supply chain understand their rights and how to raise a grievance or serious concern, the Procurement team seek to ensure that all suppliers have and communicate the details of SEGRO's Safecall 'serious concerns' telephone number to their workers.

Governance

The SEGRO plc Board is responsible for leading the business in the way which it believes is most likely to lead to long-term sustainable success. Each of the Directors is mindful of their duties under section 172 Companies Act 2006 to run SEGRO for the benefit of its shareholders, and in doing so, take into account the long-term impact of any decisions on stakeholder relationships and the impact of our activities on the environment whilst maintaining our reputation for high business conduct at all times. This includes effective engagement with our stakeholders and particularly our colleagues, with day-to-day responsibility for employee matters delegated to the Executive Committee comprising our Chief Executive, Chief Financial Officer, Chief Operating Officer and Group HR Director.

The Board, through their oversight of the Responsible SEGRO framework, provide input on human rights issues such as diversity and inclusion, mental health and wellbeing, worker engagement and fair pay. The Board and Executive Committee receive reports on Health and Safety, and compliance with the Code of Business Conduct and Ethics and our policy on whistleblowing. The Board also approve our annual Modern Slavery and Human Trafficking Statement and receive regular updates on the progress made with our Diversity and Inclusion initiatives and our nurturing talent priorities. Any whistleblowing would also be reported to the Board as appropriate.

This policy is approved by our Executive Committee. The Head of Legal 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.

