

## **GRAINGER PLC MODERN SLAVERY STATEMENT**

Grainger plc ("Grainger") is a FTSE250 business registered in England and Wales (registered number 00125575). We are committed to acting ethically and with integrity in all our business activities and relationships. We are fundamentally opposed to slavery and committed to understanding the risk of it and ensuring that it does not occur anywhere within our business and its supply chains.

This statement is made on behalf of Grainger pursuant to section 54(1) of the Modern Slavery Act 2015 ("the Act") and constitutes our anti-slavery and human trafficking statement for the financial year ending 30 September 2018.

### **Organisational Structure and Supply Chains**

Grainger is the parent company of a number of wholly owned subsidiaries which invest in, build and manage residential property in the UK. Grainger has a workforce of approximately 215 people in the UK.

Grainger operates a wide supplier base, including building, repair and maintenance contractors, professional advisers and consultants and construction companies.

### **Responsibility**

Overall responsibility for Grainger's anti-slavery initiatives is held by our Chief Operating Officer, John Kenny. Our Anti-Slavery and Human Trafficking Policy is available on request.

### **Policies and Procedures**

Over the last year we have further embedded the principles set out in our Anti-Slavery and Human Trafficking Policy into the operation and practice of our business. The Policy states our zero-tolerance approach to this issue in our business and that of our suppliers. It sets out what we expect from our staff and suppliers and sets out a framework for reporting concerns or issues in this area.

We also continue to operate a fully independent whistleblowing facility should any staff or suppliers wish to raise concerns or issues in confidence. We confirm that no such issues or concerns were raised in the past year.

### **Supplier Management**

We use a variety of suppliers to carry out works and services for us. We have developed a risk-based approach to the management of our suppliers to ensure that the due diligence and management of those suppliers is appropriate.

We have identified repair and maintenance work and cleaning as higher risk areas in our supply chain. We have asked all of our repair and maintenance contractors to become members of Constructionline, which requires all members to be aware of, and take steps to combat, modern slavery within their organisation.

We are undertaking a major review of our procurement processes and supplier base. The approach of prospective suppliers to modern slavery is an important criteria in the assessment of their suitability to undertake work on our behalf.

We have undertaken an audit of a number of our key suppliers, chosen by turnover and a consideration of the level of human slavery risk within the sectors in which they operate. Where the audit raised potential concerns, we have addressed these directly with our suppliers.

### **Training**

All Directors within our business operations have been briefed on the regulations and implications of this Act.

All staff have undertaken awareness training regarding modern slavery on the regulations, 'red flag' issues and how to raise concerns.

### **Plans for the next financial year**

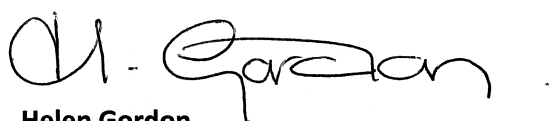
We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking.

We will continue to roll out, and require compliance with, our procurement process which includes measures to ensure that our obligations under the Act are passed through our supply chain. We will continue with our review and audit programme of our suppliers.

We will refresh and update our modern slavery awareness training to staff to ensure that all new starters are made aware of the risks and existing employees are reminded to be vigilant for signs of modern slavery anywhere in our business or supply chain.

We believe that we are implementing and enforcing effective systems and controls to, as far as practicable, ensure that slavery and human trafficking is not taking place anywhere within our operations or that of our supply chain. We expect the same high standards from those parties we engage with.

This statement has been approved by the Board of Grainger plc.



**Helen Gordon**  
**Chief Executive Officer**