

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 2016.

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 Operations Director. Our Anti-Slavery and Human Trafficking Policy is available on request.

Developing Policy

We have developed our Anti-Slavery and Human Trafficking Policy which states our zero-tolerance approach to this issue in our business and that of our suppliers. The Policy 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 operate a fully independent whistleblowing facility should any staff or suppliers wish to raise concerns or issues in confidence.

Supplier Management

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.

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

We are also introducing a new code of conduct and ethics which includes reference to human rights compliance. All our current and new key suppliers will be asked to adhere to the principles of this code and any breach of it could lead to the termination of services.

We are developing a programme of review and audit of our suppliers.

Training

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

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

Plans for the next financial year

We will ensure that our staff training and awareness programme is completed.

We will roll out our new procurement process which will include measures to ensure that our obligations under the Act are passed through our supply chain.

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

A handwritten signature in black ink, appearing to read "H. Gordon". The signature is written in a cursive, flowing style.

Helen Gordon
Chief Executive