

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 2022.

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 320 people in the UK. Our fully integrated business model is simple and ensures we are investing in and designing the best possible assets and providing great customer service.

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

Responsibility

We believe the prevention of modern slavery is a responsibility of us all. All individuals working within the Group, in any capacity, are expected to be familiar with our Anti-Slavery and Human Trafficking Policy. Ultimate responsibility for ensuring adherence to the Policy by Grainger lies with the Board.

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 by boosting awareness and training our colleagues to spot the signs of slavery. 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 employees and suppliers and sets out a framework for reporting concerns or issues in this area. Aligned with this is our corporate values and ethical standards, which are communicated to all our employees. Our policies and procedures, including those relating to Modern Slavery, feed into those values and the way we conduct ourselves.

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

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

Supplier Management

We use a variety of suppliers to carry out works and services for us with more than 95% of the direct suppliers being sourced within the UK and Ireland and no direct suppliers being sourced from countries with a high prevalence of modern slavery. We are however aware that some areas of spend, for instance Repairs and Maintenance, carry increased risk and as such we have developed a risk-based approach to the management of our suppliers to ensure that the due diligence and management of those relationships is appropriate.

We have a procurement team who oversee our procurement process practices. Our procurement strategy directly links to our corporate values. The approach of prospective suppliers to modern slavery is an important criterion in the assessment of their suitability to undertake work on our behalf. We carry out due diligence to help us assess the risk of modern slavery on potential suppliers about their policies and procedures in this area.

We understand and respond to the needs of our suppliers as a key stakeholder by acting with integrity and professionalism, paying promptly, and ensuring we are protecting the rights of all those employed through our supply chain.

Over the coming year we plan to liaise with our tier one and tier two suppliers to gain a better understanding of any risks of modern slavery in our supply chain and assessment of their adherence to modern slavery principles. We will analyse the results and are committed to take the necessary action to ensure our supply chain meets high ethical standards.

Training

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

All employees are required to undertake annual online 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 require compliance with our procurement process which includes measures to ensure that our obligations under the Act are passed through our 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.

In the interests of transparency, we have registered this statement on the Government's Modern Slavery statement registry.

This statement has been approved by the Board of Grainger plc on 8 February 2023.

A handwritten signature in black ink, appearing to read 'H. Gordon', followed by a period.

Helen Gordon
Chief Executive Officer