

Modern Slavery Statement

30 September 2024

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 (Act) and constitutes our anti-slavery and human trafficking statement for the financial year ending 30 September 2024. Data in statement is as 30 September 2024.

Organisational Structure and Supply Chains

Our purpose is to rent homes which enrich lives. Our fully integrated business model and operating platform means we invest in, design, and manage residential property in the UK.

We have a workforce of approximately 367 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 to over 25,000 residents.

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

Responsibility

We are committed to the prevention of modern slavery. All individuals working within the Group, in any capacity, are expected to be familiar with our Anti-Slavery and Human Trafficking Policy and Human Rights Policy (Policies). The Board has ultimate responsibility for Policies and arrangements and is supported by the Executive Committee and the in-house Legal Risk and Governance and Human Resources Teams.

Policies and Procedures

We have adopted the Policies which set out our zero-tolerance approach to the prevention of modern slavery and human trafficking across our business and within our supply chain. It sets out what we expect from our colleagues and suppliers and it includes a framework for the reporting of concerns or issues.

We have also adopted corporate values and ethical standards, which are communicated to all colleagues. All of our HR policies and procedures, including the Policies, feed into our values and the way in which we conduct our business.

We continue to operate a fully independent whistleblowing facility should any colleague or supplier wish to raise concerns or issues in confidence.

Supplier Management

We engage a variety of suppliers to carry out works and provide services to us with more than 95% of our direct suppliers being sourced within the UK and Ireland. We are also aware that some areas of our procurement, for instance facilities management (which includes areas such as cleaning, security and estate management), or repairs and maintenance (which includes

looking after the general maintenance of our buildings and construction activities) carry increased risk of modern slavery and human trafficking. Accordingly, 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 specialist, dedicated in-house Procurement Team who oversee our procurement process practices. We also have in place a procurement strategy which also links to our corporate values.

The approach of our prospective suppliers to modern slavery and human trafficking is an important criterion in our supplier suitability assessment. We provide a copy of the Policy and this statement to our prospective suppliers and ask them to confirm their adherence to the principles of the Act.

We will be looking to segment our suppliers according to a risk based approach and we will liaise with our tier one and tier two suppliers to gain a better understanding of any risks of modern slavery and human trafficking.

We are committed to taking steps to ensure our supply chain meets high ethical standards and this is reflected in our due diligence procedures.

We understand and respond to the needs of our suppliers as a key stakeholder by acting with integrity and professionalism, paying promptly, and seeking to protect the rights of all those engaged throughout our supply chain.

Training

We regularly brief Senior Managers within our business operations 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.

Developments in 2024

We adopted the Policies during 2024. The Policies provide that everyone is entitled to be treated fairly, with dignity, irrespective of where they live, regardless of race, sex, religion or any other status.

Our Policies are part of our commitment to respect, uphold and avoid infringing upon the human rights of others. We view our modern slavery commitments as an important part of this approach.

Plans for the next 12 months

During 2024, we also made a number of appointments into our Legal, Risk and Governance and Procurement Teams and we are using this opportunity to undertake a fundamental review of our prevention of modern slavery and human trafficking activities.

This review has begun by the Teams undertaking an updated, comprehensive risk assessment of our business operations and supply chain to identify where we consider there may be a higher risk of modern slavery or human trafficking occurring.

We will involve senior colleagues from across the Group in reviewing our operational practices to minimise the risk of modern slavery and human trafficking arising. We will also identify and engage with key suppliers and ask them to confirm how they ensure that modern slavery and human trafficking does not exist in their businesses or supply chains.

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 5 February 2025.

A handwritten signature in black ink that reads "H. Gordon". The signature is written in a cursive, flowing style.

Helen Gordon
Chief Executive Officer
For and on behalf of Grainger plc and its group of companies.