

BIG YELLOW GROUP PLC

SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our annual “Anti-slavery and Human Trafficking Statement” for the financial year ended 31 March 2021.

INTRODUCTION FROM THE CEO

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks in our business, however small, and in our wider supply chain. Our staff are expected to report concerns and our management are expected to act upon them.

We have zero tolerance to slavery and human trafficking. We expect all those in our business, our supply chain and our contractors to comply with our values. In line with the Governments review of the act, which began in 2018, we place emphasis on taking specific and targeted action as a result of a general risk assessment. We will also continue to set out our immediate plans for the coming year within this Statement.

ABOUT OUR BUSINESS

We are the most recognised self storage brand in the UK. We provide secure and modern self storage for homes and businesses. Founded in 1998 with our first store opening in Richmond, Surrey, we now operate from a platform of 103 stores, including 25 stores branded as Armadillo Self Storage. We own the freehold of the majority of our stores and have a further 13 sites for future Big Yellow development, of which six have planning consent.

Big Yellow employs 493 people. Big Yellow Group is listed on the London

Stock Exchange and is member of the FTSE 250.

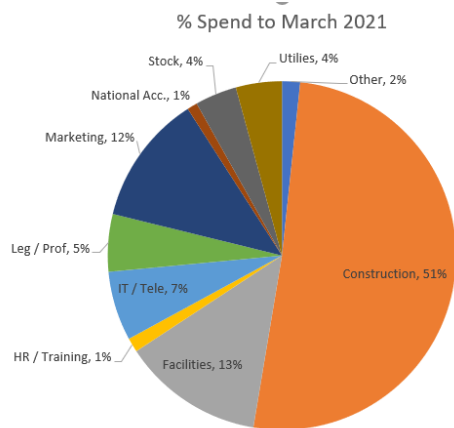
OUR SUPPLY CHAIN

We continue to manage our suppliers on a de-centralised basis, with each Department Head overseeing the onboarding, contracting and in-life management of them. Many of our suppliers have become trusted partners, having worked with us for 10 or more years.

We have been able to depend on these partners to help us maintain our storage services throughout the year, despite the pandemic. This in turn has allowed Big Yellow to maintain our storage services to our customers.

Our Construction subsidiary, Big Yellow Construction Company Limited (“Big Yellow Construction”) sources a broad variety of materials from supplier companies. Whilst these goods are not sourced directly by us, some may be specified by us. We place great value on using recycled materials in our construction process and these are procured in accordance with our guidelines. Big Yellow Construction launched its “Sustainable Construction Policy” in December 2018, which gives due consideration to social aspects – including human rights and labour laws – in its supply chain.

Our supplier base to March 2021 was made up of approximately 550 direct suppliers, the largest 56 of whom represent c. 85% of our spend.



These suppliers deliver creative and marketing services, legal and financial services, as well as the full range of real estate products and services, such as planning advice, architectural services, project management for construction, cleaning and maintenance. Many of these suppliers provide professional, highly skilled advice and services, and are therefore less likely to harbour Modern Slavery issues.

Due to Covid restrictions we did not conduct any supplier visits during the year.

During the year we considered the UK Government Modern Slavery Statement Registry; we have since submitted our responses to the online register.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking practices in our supply chains or in any other part of our business. In January 2019 we published a specific Human Rights and Anti-Slavery Policy to clearly set out what we expect from our employees and anyone acting for and on behalf of the Company.

¹ Big Yellow Policies: Whistleblowing Policy, Our Values, Employee Handbook, Big Yellow Construction Policies: Sustainable Construction Policy. For more detail on our policies, processes, risk assessments and

We have a range of supplementary policies¹ that reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE FOR NEW SUPPLIERS

Big Yellow Construction and our Facilities Department require any new suppliers and partners to adhere to the UK Modern Slavery Act as a standard; our contracts contain a specific clause to this effect.

As we enter a phase of increased construction activity over the next few years, it seemed right and prudent to conduct a further review of our processes, policies and procedures and those of our construction partners. This delivered the creation of an additional policy by Big Yellow Construction.

ASSESSING AND MANAGING RISK

We believe there is value in looking at our supply chain and associated risks holistically and have asked our Head of CSR to conduct an initial desktop review to provide the CSR Forum (and ultimately the CEO) with a clearer understanding of the overall risk to our business.

We consider the most significant risks to be in our supply chain, rather than in our own operations: our customer services team (who as a 'call center operation' may fall into a higher risk industry category) are all employed by us directly and operate from our head office in Bagshot, Surrey.

During 2017/18 we defined the risks to the industry we are in and to us specifically - and established a matrix-based approach, which considers spend

other activities taken in previous years, please see our CSR Reports on our website.

levels and business criticality to focus on the most relevant aspects of our supply chain.

The three inherent industry risks areas we have identified are:

- (i) the procurement of specific materials;
- (ii) the provision of workers on construction sites; and
- (iii) the labour services in relation to our stores, such as cleaning.

We have since reviewed this matrix-based approach and have found it remains fit for purpose.

We want to pay particular attention to ensuring our supply chains are free of child labour, illegal, forced or bonded labour and that the workers in our supply chain have their human rights protected and have safe and healthy working conditions.

We work directly with our partners to establish these themes as joint standards and have a Whistleblowing Helpline in place for anyone who wants to raise concerns. Our Construction team and Facilities team have asked their suppliers to display the Whistleblowing Helpline posters in shared spaces. For Construction specifically that means in our site cabin noticeboards.

Specifically, with regards to workers on construction sites here in the UK, we sign up to the Considerate Constructor Scheme (CCS) and some of our new builds have obligations under BREEAM, which although does not guarantee risk or issue-free practices, nevertheless provide a framework that allows Big Yellow to investigate further, if required. We use proxy aspects, such as the reporting of Health and Safety incidents or lack of protective clothing, to alert us to broader potential issues.

During 2018/19 we also reviewed our contracting procedures and policies and

completed a desktop-based risk management methodology.

This work delivered the insights required to engage with selected suppliers to understand how employees are managed and what processes and procedures they have in place to ensure our shared supply chain is free from modern slavery.

In 2019 a member of our Compliance team and the Head of CSR visited the Company's largest cleaning contractor for an in-depth interview. Our Full CSR Report 2019/20 contained information about our approach and methodology.

We identified no material issues.

PERFORMANCE AND MONITORING

Our Whistleblowing Helpline implemented during 2017 continues to be monitored and we are happy to report that no instances of Modern Slavery were reported to us.

During this year, we opened our new stores in Bracknell, Camberwell, and Battersea. The Considerate Constructor Schemes ("CCS") for the three newly opened stores were as follows: Camberwell 40; Bracknell 38; and Battersea 37.

TRAINING

(i) All employees: During 2019/2020, we utilised our internal engagement vehicle and our internal quarterly magazine 'The Bigger Space' to bring the topic of UK Modern Slavery to the attention of all our employees and remind them of the collective responsibilities we must raise concerns if we see them. The article also set out the key types of modern slavery we may come across and included links for employees to find out more.

(ii) The Board: In March 2021 the CEO received an invitation to register on the UK Government Modern Slavery Statement registry. The CEO and CFO gave this due consideration and elected

for the Company to register. Registration has since been completed.

(iii) For senior managers of the most affected departments: At a more targeted level, the work was conducted to assess inherent risks, specifically within the Construction team and Facilities team, and has needed detailed conversations about specific suppliers and their practices. This has furthered the collective understanding of the Department Heads of these functions. During the year, Construction and Facilities have reminded their suppliers to display the Whistleblowing helpline poster in shared areas.

(iv) Compliance team: During 2019 the joint supplier visit by CSR and a member of the Big Yellow Compliance team provided the opportunity to enhance the Compliance team's awareness on Modern Slavery. The visit was planned jointly with questions prepared ahead of time and discussed with the individuals attending on the day. This delivered a greater in-depth understanding of aspects of Modern Slavery and how to potentially identify them. It is hoped that conducting supplier visits jointly in future will continue to deepen the understanding of relevant individuals and provide the Company with the internal competencies and capacity required to conduct supplier visits. This had been put on hold in 2020/21 due to Covid and staff availability.

In general, we will continue to:

(i) regularly brief relevant members of staff. Key members of the management team are regularly updated by external experts on current and future requirements including the UK Modern Slavery Act.

(ii) conduct detailed pre and post visit briefs to the senior managers who are responsible for particular supplier relationships.

(iii) brief the board of directors as part of the board reporting process. When relevant, we include any supply chain risk topics or UK Modern Slavery Act briefing; for example, the board received a brief update in the November 2019 papers and a fuller update on the supplier visit conducted in the January 2020 papers.

ONGOING DISCLOSURE AND THE YEAR AHEAD

- To continue to engage current partners around their own due diligence processes, especially on Transparency and Disclosure.

During 2021/22 we intend to focus on the following:

Transparency:

- Re-engage Big Yellow's internal compliance team to agree appropriate supplier verification approach post Covid restrictions.

Setting & Monitoring standards:

- As part of our cleaning contractor visit, we had identified opportunities for improvement in our supplier's staff training, specifically with regards to health & safety aspects. The Company decided to support the supplier in enhancing its own procedures. This approach was very much welcomed by the supplier and we look to replicate this where possible.

Promoting good practice:

- Promote our Whistleblowing Hotline to our partner organisations, having just refreshed the poster display, we will continue to work with our suppliers to share the helpline number with all staff.

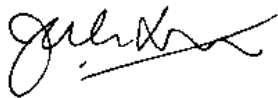
Other:

- Maintain a watching brief on the UK Modern Slavery Act Review, which commenced January 2018; and

- Reviewing the opportunity to conduct supplier visits considering Government guidance on Covid-19.

Through our activities described above, we are confident that our approach to tackling modern slavery is targeted at high-risk areas and is appropriate to the nature of our business activities.

We will continue to promote positive, collaborative and transparent business relationships with our partners.



James Gibson Chief Executive Officer
Big Yellow Group PLC

31 August 2021

About this Statement:

This statement provides an overview of our business, our supply chain and the activities we have undertaken in response to the Modern Slavery Act, focusing on actions taken since our previous statement made in 2020.

This statement is approved by the full board and that is reviewed annually.

If you have any specific questions with regards to our UK Modern Slavery Act Statement, please contact us on csr@bigyellow.co.uk.

If you have any specific concerns about slavery or human trafficking taking place in any part of our company or supply chain, please raise these – in confidence – via our whistleblowing helpline phone: 0800 890 011 then dial (833) 573 0566 or bigyellow.ethicspoint.com