



Big Yellow Group

Slavery and Human Trafficking statement

Document Ref:	June 2023-CSR-Salvry and human trafficking statement-1.5
Version:	1.5
Dated:	12/06/2023
Document Author:	R. Wheeler
Document Owner:	Head of Sustainability
Document Approver:	J. Gibson & board

General information

Purpose of document	
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 2023. This statement details the actions tackled this year demonstrating our commitment to there being no forced labour, human trafficking or slavery within either our business or supply chain.	
Review frequency	
Annual review	
Definition and interpretation	
Please explain any acronyms and terms here that feature in the document	
CCS	Considerate Constructor Scheme
SAQ	Self Assessment Questionnaire
BREEAM	Building Research Establishment Environmental Assessment Methodology
CSR	Corporate Social Responsibility

Revision History

Version	Date	Revision Author	Summary of Changes
1	April 2016	P. Donnelly	Document creation
1.1	Jan 2019	G. Zepf	Document restructured to cover compliance more fully
1.2	Aug 2019	G. Zepf	Company credentials updated; Ongoing disclosures and year ahead updated
1.3	June 2020	G. Zepf	Company credentials updated; Company supplier spend updated; Ongoing disclosures and year ahead updated
1.4	July 2022	G. Zepf	Company credentials updated; Company supplier spend updated; Ongoing disclosures and year ahead updated; Training updated
1.5	June 2023	R. Wheeler	New format, about the business, last year’s activities, this year’s plans

Online distribution

Location	Link
Intranet	http://intranet/csr/policies/_layouts/15/start.aspx#/default.aspx
Corporate Website	https://corporate.bigyellow.co.uk/sustainability/governance-and-policies

Departmental distribution

<input checked="" type="checkbox"/>	Whole Company		
<input type="checkbox"/>	Acquisitions & Developments	<input type="checkbox"/>	GDPR
<input type="checkbox"/>	Admin	<input type="checkbox"/>	IT, Digital Security and Telephony
<input type="checkbox"/>	Compliance & Store comms	<input type="checkbox"/>	Marketing
<input type="checkbox"/>	Construction	<input type="checkbox"/>	National Customers
<input type="checkbox"/>	Corporate Social Responsibility	<input type="checkbox"/>	Operations
<input type="checkbox"/>	Customer Service Centre	<input type="checkbox"/>	People, Talent and Development
<input type="checkbox"/>	Facilities	<input type="checkbox"/>	Stores
<input type="checkbox"/>	Finance	<input type="checkbox"/>	Senior Leadership Team

Contents

Introduction from the CEO	4
About our business	4
Our supply chain	4
Our policies on slavery and human trafficking	5
Due diligence for new suppliers.....	6
Assessing and managing risk.....	6
Performance and monitoring.....	7
Training	8
Ongoing disclosure and the year ahead	8
About this Statement:.....	9

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 a zero-tolerance policy 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.

After the challenges we faced last year with our supply chain we secured a solar panel provider that we are completely satisfied source their components in a way we are comfortable with and continued on to complete 23 of the initial 36 retrofit solar stores to date. This in turn prompted us to consider our wider supply chain. We have engaged with the top 80% of our value chain this year as part of our first steps into ensuring we have a safe, like-minded supply chain to work with. We have set out a program of work to continue this journey over the coming years.

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 109 stores, including 24 stores branded as Armadillo Self Storage, which the Group acquired in 2021. We own the freehold of the majority of our stores and have a further 11 sites in our development pipeline, of which six have planning consent.

Big Yellow employs 515 people and Big Yellow Group is listed on the FTSE 250 London Stock Exchange.

Our supply chain

We continue to perform the day-to-day management of our suppliers on a de-centralised basis, with each Department Head overseeing the onboarding, contracting and in-life management of their suppliers.

As laid out in last year's "ongoing disclosure and the year ahead" we have continued our cross-functional working group to deliver our supply chain risk framework SQA and worked with SGS UK to assess our existing significant suppliers.

Many of our suppliers have become trusted partners, having worked with us for 10 or more years. We have spoken with 27 suppliers this year, representing the top 80% of our supply chain across a number of areas: facilities, construction, IT and packing materials.

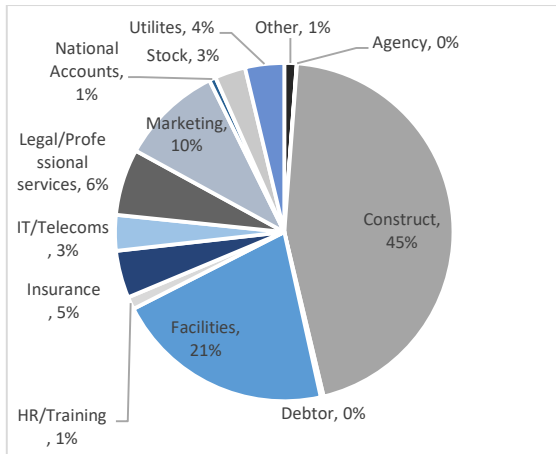
We now:

- Have a better understanding of the operational set up of our key suppliers
- Are working with our new solar panel supplier and existing installer to ensure we continue to meet our ethical standards
- Continue to work with our cleaning contractor identifying areas of improvement and creating a plan to help them tackle these areas

- Continue to share our whistleblowing Hotline with staff and contractors

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 combined Armadillo and Big Yellow supplier base to March 2023 was made up of 722 direct suppliers, the largest 61 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.

[Our policies on slavery and human trafficking](#)

We are committed to ensuring that there are 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. This is updated every two years, the most recent version being 2023.

We have a range of supplementary policies 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. These include:

- Whistleblowing Policy,
- Our Values,
- Employee Handbook,
- Big Yellow Construction Policies: Sustainable Construction Policy.

For more detail on our policies, processes, risk assessments and other activities taken in previous years, please download our CSR Reports.

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 entered a phase of increased construction activity over the last 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: The 'Construction, Corporate Social Responsibility Policy Statement March 2023'.

It is our intention over the coming years to continue to update our supplier onboarding processes.

Assessing and managing risk

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 centre operation' may fall into a higher risk industry category) are all employed by us directly and operate from our head office in Bagshot, Surrey.

Pro-active investigations

We believe there is value in looking at our supply chain and associated risks holistically.

Since 2019-20 our Head of Sustainability has been collaborating internally with our Environmental committee and externally with our consultants, SGS, to develop a framework to be able to monitor our supply chain. During the year we have asked 27 of our highest spend tier one suppliers to complete the SAQ we created.

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.

The suppliers we have selected for the third-party risk review meet at least one of those criteria and make up the top 80% value of our supply chain.

We 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.

The SAQ addresses a broad range of questions, from labour rights to environmental ambitions. We have been able to ascertain that, although there are areas of improvement, there were no high-risk areas of concern that came from the process. It has enabled us to identify areas for us to pay attention to.

Over the next three years we will be focusing on working with the lower scoring suppliers on areas such as anti-corruption and business ethics, ensure all of our tier 1 suppliers have a documented CSR policy and helping them with their own supply chain management which will in turn improve our tier 2 and beyond. We will also be improving our onboarding process internally to help ensure any new suppliers have policies and processes in place that we are comfortable with.

Whistleblowing

We have a Whistleblowing Helpline in place for anyone who wants to raise concerns. Our Construction and Facilities teams have asked their suppliers to display the Whistleblowing Helpline posters in shared spaces. For our Construction activities that specifically means on our site cabin noticeboards.

With regards to workers on construction sites here in the UK, we sign up to the CCS and most of our new builds have obligations under BREEAM, which although not guaranteeing risk or issue-free practices, nevertheless provides 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.

Performance and monitoring

Whistleblowing

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

Considerate Constructors Scheme

During the year, we built and opened new stores in Harrow and Kingston North. The CCS for these stores were as follows: Harrow 41; Kingston North 39.

External monitoring

It is the responsibility of everyone working for and with Big Yellow to raise any concerns that they have, so that the company may give these concerns due consideration and take the necessary actions.

Management process

- I. **The Board:** In 2021 the business registered on the UK Government modern slavery statement registry.
- II. **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 and Facilities departments, 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 once again reminded their suppliers to display the Whistleblowing Helpline poster in shared areas.
- III. **All Department Heads with significant supply chains** (based on spend) are part of the current Supply Chain Risk work (namely our Construction Director, Head of Estates and Facilities, Office Manager, Operations Director, and the Head of Sustainability, with the Head of Sustainability having responsibility for managing the process with the external partner).
- IV. **The Area Managers and Department Heads** are furthermore nominated as first point of contact for employees to raise concerns. This is in addition to our confidential Whistleblowing helpline and may be more appropriate where an employee observes any instances of concern and is unsure whether to formally report that or not.
- V. **Compliance team:** Have conducted joint supplier visits with CSR and a member of the Big Yellow Compliance team. This 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.

Other

- 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. After potential human rights issues with our solar panel manufacturers were identified in September 2021, the board was fully involved in assessing the risk, determining the course of action (stop purchasing the solar panels in question), investigating a suitable alternative, and determining on a new, acceptable supplier. This process took place both as part of the formal board meeting process as well as emails and telephone calls in between the formal meetings.
- IV. Horizon scan publicly available information to identify any articles or claims of potential slavery activities associated with our supply chain.

Training

Until last year, we utilised our existing internal communication channels to highlight Modern Slavery topics to inform and educate our employees. As part of last year's review of our modern slavery training the following updates were made to our approach.

- I. All store employees, Learning & Development team, Area Managers, Regional Managers and Compliance team: we will require all of our employees to take note of our internal briefing on UK Modern Slavery and sign off on having understood the role they can play in raising issues. We ask all store-based employees to raise any concerns they have with their Area Managers or the relevant Department Head in the first instance. We intend to repeat this formalised briefing every three years.
 - a. So far there has been a 96% completion rate of this training. That is 403 out of 422 store based employees.
- II. Key people in our head office who were identified as having a role that was relevant for the training: we have purchased an external e-learning programme on Modern Slavery and require all identified individuals to undergo this training every three years.
 - a. We have a 100% completion rate for this training.

Ongoing disclosure and the year ahead

Proactive supply chain engagement:

- Continue the good work started with SGS on our supply chain risk framework creating plans with the lower performing suppliers and work with them to enable improvement in some of the areas they do not have formal processes in to date.
- Ensure we have full compliance from all suppliers involved in the SAQ process with Big Yellow's anti-bribery and corruption policy.

Internal process updates:

- Create an internal code of conduct document for our new suppliers to sign up. This will bring together our policies and values so that all suppliers working with us have a clear picture of our expectations from them.
- Review our onboarding process to ensure we record all supply chain risk assessments formally going forward.

General good practice:

- Continue to horizon scan for any emerging information that may come to light publicly about possible risks within our supply chain and then take action if needed.
- Continue to Promote our Whistleblowing Hotline. We will continue to work with our suppliers to share the helpline number with all staff.
- Maintain a watching brief on the UK Modern Slavery Act Review, which commenced January 2018.

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.

Jim Gibson
Chief Executive Officer
Big Yellow Group PLC
June 2023

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 2022.

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


Jim Gibson Chief Executive Officer
June 2023