

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 “Anti-slavery and Human Trafficking Statement” for the financial year ended 31 March 2019.

INTRODUCTION FROM THE CEO

Slavery and human trafficking remains 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 supply chain and our contractors to comply with our values.

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-upon-Thames, we now operate from a platform of 99 stores, including 25 stores branded as Armadillo Self Storage in which the Group has a 20% interest. We own the freehold of the majority of these stores and have a further twelve sites for future Big Yellow development, of which three have planning consent.

Big Yellow employs over 450 people and is listed on the FTSE 250 London Stock Exchange with a market capitalisation of approximately £1.6 billion.

OUR SUPPLY CHAIN

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

In addition, our Construction subsidiary, the Big Yellow Construction Company (Big Yellow Construction) sources a broad variety of materials from companies on our behalf. 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.

Across our business we have c. 600 direct suppliers, fewer than 80 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.

A large number of these suppliers provide professional, highly skilled advice and services and are therefore less likely to harbour Modern Slavery issues. To date, we have focused our efforts on our more manual, labour intensive industries, such as construction and cleaning.

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. We have a range of 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

Our Construction and Facilities Departments require any new suppliers and partners to adhere to the UK Modern Slavery Act as a standard; our contracts contain such a specific clause.

As we enter a phase of increased construction activity, it seems right and prudent to conduct a further review of our processes, policies and procedures and that of our 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 centre operation’ may fall into a higher risk industry category) are all employed by us directly and operate from our head office in Bagshot.

During 2017/18 we defined risks to the industry we are in and to us specifically and established a matrix-based approach, which considers spend levels and business critically to focus on the most relevant aspects of our supply chain.

Our 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 want to pay particular attention 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.

Specifically, with regards to workers on construction sites here in the UK, we sign up to the Considerate Constructor Scheme (CCS) and all of our new builds have obligations under

¹ Big Yellow Policies: Supply Chain, Contractor Labour and Environmental Standards Guide; Equal Opportunities / Human Rights
Big Yellow Construction Policies: Sustainable Construction Policy

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 Health and Safety incidents or lack of protective clothing, to alert us to broader potential issues.

PERFORMANCE AND MONITORING

During 2017/18 we implemented and monitored our new whistleblowing policy and we are happy to report that no instances of Modern Slavery were reported to us.

We have managed to achieve the standard for the CCS we are aiming for (minimum of 35 out of 40 points) on each of our current construction sites.

We have dedicated more time and resource for desktop assessments of our supply chain and intend to report on any significant findings on an annual basis.

TRAINING

There was no formal training provided during 2018/19; however, the work conducted to assess inherent risks, specifically within the Construction and Facilities departments has furthered our collective understanding.

Particularly the engagement with Big Yellow Construction has resulted in an additional policy and enhanced contracting processes, where conforming to the UK Modern Slavery Act is now a mandatory contract requirement.

We (i) regularly brief relevant members of staff (all Directors have been briefed on the subject) and (ii) involve all relevant individuals and departments in the risk assessment process. As part of the bi-monthly board reporting process, we have the option to include any supply chain risk topics or UK Modern Slavery Act briefing necessary – there were no specific updates to the board during 2018/19.

ONGOING DISCLOSURE AND THE YEAR AHEAD

- To continue developing our risk matrix
- To promote our Whistleblowing Hotline to partner organisations; and
- To continue to engage current partners around their own due diligence processes, especially on Transparency and Disclosure.

During 2019/20 we intend to focus on the following:

Transparency:

- Carry out further due diligence – moving from sector specific risks to supplier specific risk;
- Work with Big Yellow's internal compliance team to agree appropriate supplier verification approach. This may include auditing of specific suppliers.
- Close any knowledge gaps we have identified through the desk-top work in terms of how work is conducted within our supply chain.

Setting & monitoring standards:

- Decide on a course of engagement with suppliers in more labour intensive industries; this may include checking up on supplier processes for hiring labour, examining their health & safety records and paying close attention to the suitability of protective equipment provided by our suppliers.

Promoting good practice

- Promote our Whistleblowing Hotline to partner organisations

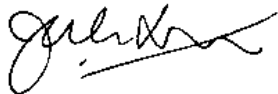
Other

- 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.

James Gibson
Chief Executive Officer
Big Yellow Group PLC



August 2019

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 2016.

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