

Modern Slavery and Human Trafficking Statement
Financial Year 2019 (January – December 2019)

Slavery, human trafficking and child labour and any other form of human rights abuse have no place in our business and at Grosvenor Group (the “Group”) we recognise the important part we can play in helping to ensure that our properties, places and supply chains are free from such abuse.

We continue to believe that by creating a culture of awareness within our own organisation and by actively requiring and supporting transparency and preventative measures through our business relationships, we can help prevent such abuses. We commit to responsible business practices including full and active support for the aims of the UK Modern Slavery Act 2015.

In publishing this annual statement, we, as Grosvenor Group Limited, are pleased to outline the structure of the Group and its supply chains and explain the steps that the Group has taken during financial year 2019 to prevent slavery and human trafficking in our business and supply chains. This statement is aligned with the Ethical Trading Initiative’s [Modern Slavery Statements Evaluation Framework](#).

Section 1: Business, Structure, Personnel and Supply Chains

There were no significant changes in business, structure, personnel or supply chains since our last statement for Financial Year 2018 (issued in June 2019).

Business and Structure

Grosvenor Group is a privately-owned international property company. With a track record of over 340 years, we develop, manage and invest with a purpose of improving property and places to deliver lasting commercial and social benefit. We are active in 56 cities around the world. This activity is initiated independently or jointly with third party partners. The Group consists of four regional Operating Companies and an Indirect Investment business:

Operating Companies

Grosvenor Britain & Ireland, Grosvenor Americas, Grosvenor Asia Pacific and Grosvenor Europe develop, manage and invest in property assets predominantly in the retail, residential and office sectors. They operate within a devolved model, each being responsible for its own property strategies, which enables the Group to diversify by geography, sector, activity, currency and management team.

Indirect Investment

Our Indirect Investment business further diversifies the Group’s property interests by backing specialist third-party management teams. It invests Grosvenor’s capital in Europe, North and South America, Australia and Africa.

Employees

As at 31 December 2019, the Group employed 566 people. The majority of these people were located in the United Kingdom, primarily at 70 Grosvenor Street, London. The remaining people worked from offices in Canada, China, France, Hong Kong, Japan, Luxembourg, Spain, Sweden and the United States of America.

These employees consisted of executives, property professionals (investment, asset and property, development, construction and project management) and finance, treasury, tax, legal, company

secretarial, information technology, human resources, strategy and research, marketing and communications, personal assistant and office management professionals.

As suggested by the Ethical Trading Initiative's Framework, we also note that there are no worker representative organisations applicable to Grosvenor's employees due to the size, constitution and/or choice of its workforce.

Supply Chains

In 2019, we continued to source a wide range of contractors and materials to support our global real estate businesses.

These contractors and material suppliers generally fell within the following areas: Agents, Valuers, Repairs and Maintenance, Facilities, Cleaning, Security, Architects, Construction, General Contractors, Designers, Electrical, Engineers, Decorators, Landscape / Garden, Environmental, Health and Safety, Marketing, Travel, Events, Research, Auditors, Lawyers, Accountants, Advisors and Consultants, IT Hardware, Software & Services, Recruitment, Training and Other HR Related, Subscriptions, Professional Associations & Publications, Office Consumables, Utilities, Local Authorities, Banks and Insurance. We also occasionally employed temporary staff from a small number of trusted recruitment agencies.

In terms of our visibility of our supply chain, we maintain records of our direct contractors and material suppliers ('tier 1'). Below this, we also know the identity of the significant sub-contractors used by our Repairs and Maintenance, Facilities and Construction/Development contractors ('tier 2'), as well as significant indirect material suppliers used in our main construction / development projects. Contractors in these areas do not generally subcontract without our written permission. However, like most companies, we recognise that we are less aware of the identity of sub-contractors and indirect material suppliers to the extent they are used outside of these areas and rely on measures implemented by our tier 1 suppliers to mitigate risks of modern slavery and human trafficking in their supply chains.

For more information about us, our business and our structure, please visit www.grosvenor.com.

Section 2: Modern Slavery and Human Trafficking Policies

The Group has a specific Anti-Slavery and Human Trafficking Policy. This sits within a broader framework of policies that support ethical behaviours and cultures within the Group. Our policy makes clear that all forms of slavery and human trafficking are unacceptable to us and requires that steps be taken to ensure these do not occur in our businesses and supply chains. It applies to all of the Group's personnel and businesses. In response to this Policy, the Operating Companies and Indirect Investment have all implemented measures to prevent modern slavery and human trafficking informed by their assessed risk (as described in the later sections of this statement).

We have successfully finalised our 3-year anti-modern slavery plan which is designed to review the breadth, depth and quality of the Group's efforts to prevent modern slavery and human trafficking and ensure these are appropriate to its activities. This gained the support of the Group Executive Committee and will be reviewed again in 2020. The first phase of the plan, which was completed in 2019 was put in action within our largest market. It included a review of Grosvenor Britain & Ireland (our UK Operating Company which represents 50% of the Group's economic property interests, which contributed £41.1m of Revenue Profit to the Group's total of £65.9m in 2019) and the piloting of a number of new initiatives explained in later sections of this statement. The learnings gained from

phase 1 are expected to be evaluated by all of Operating Companies and Indirect Investment during 2020.

More generally:

- We maintain our long-held commitment to the values of integrity, respect and trust. All personnel are expected to demonstrate behaviours in line with these values.
- Each part of the Group operates its own recruitment and procurement policy / practices appropriate for its business activities. In 2019, these continued to meet or exceed applicable employment laws and standards.
- Grosvenor Britain & Ireland has also launched a Supply Chain Charter. The Supply Chain Charter includes, amongst other things, commitments and expectations for suppliers relating to the prevention of slavery and human trafficking and, more broadly, the conduct of business in an ethical manner.

Section 3: Risk Assessment

Our Anti-Modern Slavery and Human Trafficking Policy requires each part of Grosvenor's business to consider the appropriateness of its due diligence practices to ensure modern slavery and human trafficking does not form part of Grosvenor's businesses and supply chains. This was considered with the relevant heads of finance and legal for each part of the Group.

We continued to consider the risk of modern slavery and human trafficking occurring within the Group's own workforce to be very low / negligible in FY2019 given its size, skills and professional nature. Our personnel are paid above the UK living wage (or equivalent outside of the UK).

Outside of our own workforce, we recognise there is in general a higher risk of slavery and human trafficking in real estate industry supply chains, for example:

- Development and construction, repairs and maintenance and event contractors are higher risk due to the potential use within the industry of low paid, migrant labour and agencies.
- Suppliers of development and construction materials from countries with high unemployment, weaker labour laws and/or enforcement are also higher risk.

However, in FY2019 we continued to consider that the risks for our supply chains are lower than the risks for general real estate industry supply chains. This is because at Grosvenor we typically work with contractors and third-party partners who have similar ethical values, reputational concerns and regulatory obligations and who use known personnel and subcontractors, and generally do not rely on lowest cost as a procurement criteria.

Section 4: Due Diligence, Prevention and Mitigation

The Anti-Slavery and Human Trafficking Policy requires appropriate due diligence of new suppliers. Taking account of the relatively low risks identified, Group companies continued to meet this requirement in FY2019 in one or more of the following ways:

- Incorporating anti-modern slavery and human trafficking into their existing procurement policies / processes and asking suppliers to confirm their anti-slavery and human trafficking

practices for all material value engagements. In common with many organisations, our Group companies use standard spend thresholds to identify material value engagements. As part of our 3 year anti-modern slavery plan, we have also developed a more specific set of indicators designed to more accurately identify suppliers at higher risk of modern slavery and a new set of due diligence questions designed to more easily identify and compare our higher risk suppliers' preventative measures. This was piloted by Grosvenor Britain & Ireland with several of its significant existing suppliers as part of its roll out of its Supply Chain Charter.

- Including contractual obligations designed to mitigate modern slavery in our supply chain within our new supplier, joint venture, tenancy and other significant commercial agreements and discussing these with suppliers during contractual negotiations.

We also continued to consider our general human resource processes and background checks to be sufficient to mitigate risk of modern slavery and human trafficking in our own workforce (which was assessed to be very low / negligible due to the nature and size of our professional workforce).

Section 5: Effectiveness and KPIs

Three Key Performance Indicators (KPIs) continue to be used to measure the effectiveness of anti-modern slavery and human trafficking measures:

- Our employee compliance training includes questions and assessments to test awareness.
- Our personnel are required to report any instance of modern slavery or human trafficking to management directly or through our whistleblowing hotline.
- Our Anti-Slavery and Human Trafficking Policy contains organisation-wide obligations relating to due diligence requirements, contracts and joint venture agreements. Compliance must be certified by the management of each Operating Company and the Indirect Investment business at the end of each financial year.

The first phase of our 3-year modern slavery plan has also resulted in the pilot of two new KPIs through the roll out of Grosvenor Britain & Ireland's Supply Charter:

- New due diligence questions enabling us to more easily contrast our higher risk suppliers' anti-modern slavery and human trafficking measures and track improvements; and
- Reporting on the percentage of higher risk suppliers' employees trained on modern slavery issues.

Grosvenor Britain & Ireland will continue to monitor these KPIs into 2020 and the second phase of our modern slavery plan will seek to evaluate whether these methods are effective KPIs for our anti-modern slavery measures for implementation into general UK supplier management processes. They will also be shared with our non-UK Operating Companies for their evaluation.

Section 6: Training and Capacity

A specific modern slavery training module is available in our employee online learning platform. Our existing employees successfully completed this training module in 2018 and it was mandatory for new joiners in 2019. We expect our suppliers to also provide appropriate training to their workforce as part of their contractual commitment to provide reasonable preventative measures. If suppliers wish to do

so, they can use the user-friendly guidance on modern slavery that Grosvenor Britain & Ireland has secured on their behalf as part of its membership of the Supply Chain Sustainability School. This capability is expected to be more broadly communicated to suppliers as Grosvenor Britain & Ireland continues with the roll out of its Supply Chain Charter in 2020.

Our Group Data Protection and Compliance Officer advises the Group on its anti-slavery and human trafficking framework, coordinating with property, human resources, finance and legal teams and taking account of evolving market practice and legislative initiatives in relation to modern slavery.

Mark Preston

Group Chief Executive, Grosvenor Group Limited

For and on behalf of Grosvenor Group Limited and its Group companies*

29 June 2020

* This statement is in accordance with section 54 of the Modern Slavery Act 2015 and covers Grosvenor Group Limited's financial year ending 31 December 2019. The statement covers Grosvenor Group Limited and its subsidiaries, including those UK companies with a turnover greater than £36m, being:

- Grosvenor Limited
- Grosvenor West End Properties
- Grosvenor Estate Management Limited