

Modern Slavery and Human Trafficking Statement

June 2017

Grosvenor Group is committed to doing business in a responsible way, and through our activities, to earning a reputation for quality, integrity and social responsibility.

Aligned with this objective is our wholehearted and active support for the aims of the U.K. Modern Slavery Act 2015.

Our commitment is to ensure that slavery, human trafficking, child labour - indeed, any abuse of human rights - have no place in or around our organisation. We recognise the importance of the role we can play in preventing such abuses within our spheres of influence, to create a culture of awareness and transparency and actively engage in the eradication of modern day slavery.

In publishing this annual statement*, we are pleased to outline the steps that Grosvenor Group Ltd (the "Group") has taken to meet these objectives.

About Grosvenor

Grosvenor is one of the world's largest privately owned property businesses. We create, manage and invest in properties and places in more than 60 cities around the world, applying rigorous financial discipline to achieve commercial success. But we do so with the aim of making a lasting contribution, today and for future generations, to the economic, social and environmental wellbeing of the urban communities we are part of and on which our own success depends. It's what we call our '**Living cities**' philosophy, which guides our activities to help foster thriving places which reflect the spirit of individual cities, ultimately contributing to their enduring success.

Organisational structure and supply chains

Our Group consists of four regional Operating Companies and an Indirect Investment portfolio managed by the holding company.

Direct investment:

Grosvenor Britain & Ireland, Grosvenor Americas, Grosvenor Asia Pacific and Grosvenor Europe operate in a devolved structure model, each being responsible for its own property strategy founded on local experience and assessment of market opportunities.

Indirect investment:

Our Indirect Investment business is tasked with further diversifying Grosvenor's property-related interests beyond the expertise and strategies of our four regional Operating Companies.

As at 31 December 2016, Grosvenor employed 565 real estate and other professionals. For more information about us, our business and our structure, click [here](#).

Supply chains:

Our supply chains relate to our global real estate and professional service business and encompass personnel, goods and services to support our property business. We source a wide range of goods and services, and our suppliers cover an extensive range of manufacturers, construction companies, material suppliers and professional service providers.

Organisational policies

Upholding a reputation for quality, integrity and social responsibility is one of the Group's three strategic objectives. Running a business which aims to live up to the highest ethical standards and with integrity is at the heart of the Grosvenor Group Compact which acts as a constitution between the Group and its shareholders.

Grosvenor has a zero-tolerance approach to modern slavery. We oppose all forms of slavery and human trafficking, and are committed to taking steps to ensure that these do not occur in our business or our supply chains.

Our modern slavery policy forms part of a series of policies which reflect our commitment to responsible, sustainable and ethical business. These include but are not limited to:

- Employment and labour practices and policies that include matters relating to diversity and equal opportunities
- Anti-Money Laundering (AML), Counter Terrorist Financing (CTF) and Sanctions
- Gifts, Hospitality and Anti-Bribery
- Codes of conduct
- Tax policy

Due diligence and risk assessment

Through a cross-functional working group, we have commenced a process of reviewing our business and supply chains to identify and assess the risk of slavery and human trafficking as well as the measures already in place to address such risks, and any additional measures that may be warranted in light of the review.

While cognisant and vigilant that we could be at risk of slavery or human trafficking within our own business, we believe that there is a greater risk of slavery or human trafficking occurring within our supply chains (including suppliers of personnel, goods and services) particularly where we are involved, directly or indirectly, in the development, construction and ownership of property.

We acknowledge that slavery and human trafficking exist in many jurisdictions in which we operate, and/or from which we procure goods or services, and accordingly we are developing and implementing measures to identify and address any relevant issues that may arise.

Specifically, we are developing an approach to due diligence which extends to both our business and our supply chains, including an assessment of our global supply arrangements. For example in 2016, we have:

- updated our UK supplier questionnaire to include questions to help us understand a potential supplier's commitment to ensuring that no modern slavery is taking place in its business and own supply chains; and
- developed a process with the aim of ensuring that appropriate contractual provisions are incorporated into new supplier contracts, leases, joint venture agreements and other commercial agreements and renewals of such existing contracts, which require a supplier to take steps to ensure that slavery and human trafficking are not taking place in its business or in its supply chains, and enable us to obtain information to confirm the foregoing.

Training

We are rolling out measures designed to ensure that Grosvenor staff are trained to identify possible incidences of slavery and human trafficking, and to understand the implications of the Modern Slavery Act for our organisation. For example, we are developing a mandatory online training programme for all our staff, covering the topic of modern slavery, the requirements of the Modern Slavery Act and its implications for the Grosvenor business. We are also working on the development of specific training programmes for groups of our staff, such as the teams involved in procurement and human resources, in relation to the issues relevant to their areas of expertise.

Plans to strengthen our approach in future

In 2017 and beyond, within the Group, we intend to strengthen our due diligence processes, develop a risk assessment toolkit, build capacity by rolling out guidance and practical case studies on modern slavery to leadership teams and other employees on the ground, and engage with relevant global and local stakeholders to inform risk. Furthermore, within our supply chains, we intend to implement a supplier code of conduct, and increase the level of engagement and support provided to procurement teams to help them understand modern slavery issues and their role in identifying risks within Grosvenor's supply chains.

Mark Preston

Group Chief Executive, Grosvenor Group Limited

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

15 June 2017

* 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 2016. The statement covers the Group and its subsidiaries, including those UK companies with a turnover greater than £36m, being:

- Grosvenor Limited
- Grosvenor West End Properties