



# Northern Trust Group Limited

## Modern Slavery Statement

Northern Trust Group Limited is an independent group of companies which operates in England and Scotland only and works on a financial year from 1st April to 31st March. This statement is pursuant to the financial year ending 31st March 2018. The Group owns an investment portfolio of industrial, trade and office parks and also a residential and commercial land bank which it seeks to promote and develop.

### Our commitment

We are committed to making a positive contribution to society by developing and implementing business practices which allow us to deliver financial success whilst conducting our business strategy and operations in a responsible manner. We are committed to identifying, preventing and monitoring risks of slavery, human trafficking, forced or bonded labour, or involuntary prison labour in our supply chain and operation. We have a zero tolerance approach to such practices.

Within its investment portfolio the Northern Trust Group business model is the letting of industrial and office units to independent tenants. We ensure by carrying out credit checks on each prospective tenant that they are who they say they are, and that they have a right to work in the United Kingdom through their national insurance number. Also our Management Surveyors visit our sites regularly so we retain an awareness of what is happening at each unit. Northern Trust Group suppliers and contractors range from professional advisors to building contractors and agents and also more regional and local contractors who provide services to the Group. All of our suppliers and contractors are based in England, Wales and Scotland. Northern Trust Group expects all its contractors to adhere to the Group's Modern Slavery Policy, and we are committed to working only with suppliers and contractors, who treat their obligation to Modern Slavery with the utmost importance. Northern Trust Group will not work with any organisation that refuses to display the corresponding commitment to the subject of Modern Slavery and will write to any supplier or contractor to raise any suspicions that we have with regard to non-compliance.

The Directors of Northern Trust Group believe that ensuring there is no form of modern slavery within our supply chains is fundamental to the aims and values of the Group and accordingly have approved this statement and Modern Slavery Policy.

This statement and policy will be reviewed on an annual basis unless it is believed that there is some degree of risk or non-compliance in which case an earlier review will be held.

# Modern Slavery Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and third party representatives. This policy does not form part of any employee's contract of employment and we may amend it at any time.

## Responsibility for the Policy

The Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and must be addressed to the Director.

## Compliance with the Policy

Employees must read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy and must notify their immediate line manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage. If they believe or suspect a breach of this policy has occurred or that it may occur they must notify their manager as soon as possible. We will give notice to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains. If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, the employee will raise the issue with a manager or Director. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they will inform the Director immediately. If the matter is not remedied, the employee will raise it formally using our Grievance Procedure, which can be found in the Company Handbook.

## Communication and Awareness of this Policy

Communication and awareness of this policy forms part of the induction process for all individuals who work for us, and training will be provided as necessary. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## Companies covered by this Policy

Northern Trust Group 1 Limited  
Northern Trust Group 2 Limited  
Northern Trust Group Limited

Northern Trust Company Limited  
Metacre Limited

**Patrick Hemmings**  
**Director**  
**Northern Trust Group Limited**