

# HIGHGROVE

—GROUP OF COMPANIES—

## Modern Slavery Statement

Highgrove Group plc (the “**Company**”) is committed to eliminating acts of modern day slavery from within its own business and the business of its subsidiary undertakings. The Company acknowledges and accepts its obligations under the Modern Slavery Act 2015 and will ensure transparency within the organisation, its subsidiary undertakings and with suppliers of goods and services to the Company.

The Company is a privately-held public limited company which holds and manages investments in the construction, housebuilding, strategic land, logistics and retail property sectors.

The Company does not operate any overseas branches nor does it conduct operations outside the United Kingdom.

The Company falls within the prescribed turnover thresholds for reporting under the Modern Slavery Act 2015 largely by virtue of the turnover of its subsidiary undertakings. The relevant subsidiary undertakings (where applicable) maintain their own Modern Slavery Statements separate to that of the Company and those should be consulted where appropriate.

The Company holds and manages investments and does not substantially trade in its own capacity. The Company ensures that its relevant subsidiary undertakings are aware of and act in compliance with their obligations under the Modern Slavery Act 2015.

The Company operates a whistleblowing policy which allows employees to raise any concerns over modern slavery (or any other issues) in confidence.

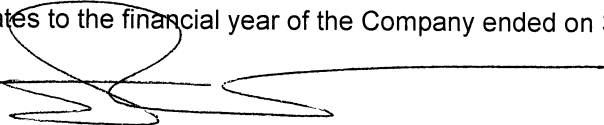
The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

This statement has been unanimously approved by the Company's board of directors and the Company is committed to providing adequate training and investment to ensure that trafficking is not taking place within the organisation, its subsidiary undertakings or within its supply chains.

The directors and senior management shall take responsibility for implementing this policy statement.

This policy statement is to be published on the Company's website (with a link in a prominent place on the website's homepage) and reviewed on an annual basis.

This policy statement relates to the financial year of the Company ended on 30 September 2018.

Signed:  .....

Jarrod Best – Chairman

Date: 22<sup>nd</sup> November 2018 .....