

Modern Slavery Statement

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015, and outlines the steps which the Company has taken to ensure that instances of slavery and human trafficking do not occur within our business or our supply chains.

We, HB Reavis UK Ltd, are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. We are committed to ensuring transparency in our own business and in our own approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all our contractors, suppliers and business partners. Our training, existing policies and practices are relevant to ensure there is no forced labour or slavery in our supply chains or business.

HB Reavis UK Ltd is part of the HB Reavis Group, which is a fully integrated property developer with a major portfolio of investment properties. The Group has employees worldwide and operates in Slovakia, Czech Republic, Poland, Hungary, Germany and the United Kingdom.

Our business is as a construction manager. In the United Kingdom, we specialise in the development and management of office space solutions.

Our supply chains include trade contractors, sub-contractors, building product suppliers, consultants, IT and office equipment providers, professional services from lawyers, accountants and other advisors. In certain circumstances, we will administer the performance of such services for our clients as their construction development manager.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies. Our zero-tolerance approach to modern slavery reflects 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. We expect each and every entity in our supply chain to conduct due diligence on their suppliers, particularly where it is not practical for us to have a direct relationship with all links in the supply chain.

We have the following policies:

- Speak Up Policy (our Whistleblowing Policy)
- Code of Business Ethics
- Equality and Diversity Policy

The Speak Up policy and our Speak Up whistleblowing channel actively encourage the reporting and exposure of illegal and unethical behaviour. Any concerns reported are investigated thoroughly and appropriate action is taken by our Speak Up Committee in accordance with the Speak Up Policy.

Our Code of Ethics expresses that we do business honestly, fairly and with respect to the individual and the wider public. All employees under this policy are responsible for ethical behaviour. In addition, our leadership are expected to make decision and role model the highest standards of behaviors in line with our company values and principles.

We recognise the importance of establishing a fair and inclusive culture and work environment, where our people are valued, their differences are respected, and discrimination is eliminated, as supported by our Equality and Diversity Policy. We promote diversity at HB Reavis not just because it is the right thing to do; we promote diversity because it's essential for delivering on our strategy.

As part of our initiative to identify and mitigate risk we carry out a risk assessment of our business and, at the procurement stage, each entity in our supply chain.

As part of the risk assessment carried out at the procurement stage, we have adopted systems to:

- Identify and assess potential risk areas in our supply chains, by ensuring that new suppliers and contractors must go through our risk assessment prior to being engaged. Typically, such risk assessments will require the completion of reference checks and a pre-qualification questionnaire; which specifically requires the supplier/contractor in question to outline the steps they are taking to ensure there is no modern slavery or human trafficking in their supply chain or in any part of their business. In addition, we hold interviews with key personnel of each supplier/contractor and canvass opinion from our professional advisors in respect of the suitability of a supplier/contractor, prior to engagement.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, through direct management of contractors on the development sites and the inclusion of provisions on modern slavery and human trafficking in our contracts.
- Identify countries where the supplier organisation operates that are or may be vulnerable to slavery and human trafficking.
- Identify whether particular relationships or transactions are susceptible to involve slavery and human trafficking.

We do not tolerate slavery and human trafficking. We require those in our supply chain to comply with our values and include provisions into contracts or terms and conditions requiring the supplier to comply (and ensure compliance with) with the Modern Slavery Act 2015.

We also have an active presence on site and direct contact with site operatives allowing us to identify potential problems.

We are committed to ensuring this process works effectively and will monitor it regularly, adapting as necessary to the changing needs of our business.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Supplier screening. The number and type of issues identified on screening suppliers and sub-contractors.
- Tier of supplier. Which tier of supplier has been vetted in a particular year.
- Subcontractor inspections. The number of inspections of sub-contractors in at risk countries.
- Whistleblowing. The number of reported breaches in the past year.
- Training. The number or percentage of staff trained.
- Remedial action. The instances of remedial action being needed.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we endeavour to provide training to our staff on the risks posed by these issues and the Company's approach to modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our groups slavery and human trafficking statement for the financial year ending 31st December 2024. It was approved by the board on 14 November 2025.