

## URBAN&CIVIC PLC AND SUBSIDIARIES (“the Company” or “U&C”)

### Supply Chain Ethical Labour Policy

#### U&C’s Ethical Labour Policy Statement

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.

Urban&Civic plc and all of its subsidiaries are committed to upholding the highest standards of ethical conduct and social responsibility as we recognise the importance of tackling the risks of modern slavery and human trafficking worldwide. U&C strive to act responsibly, ethically and with integrity in all of its business dealings and relationships and are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

The Company is committed to ensuring there is transparency in its own business and in the approach to tackling modern slavery throughout its supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. U&C expects the same high standards from all of its joint venture partners, contractors, housebuilders and suppliers. As part of the contracting processes, there are specific prohibitions included against the use of slaves, forced, compulsory or trafficked labour, and the Company expect that all of its joint venture partners, suppliers, contractors and housebuilders will hold their own suppliers, contractors, sub-contractors and labour suppliers to the same high standards.

This policy sets out U&C’s commitment to tackling the risks of modern slavery in its supply chains and applies to everyone in those supply chains including joint venture partners, contractors, housebuilders and suppliers.

The purpose of this policy is to ensure that those businesses in U&C’s supply chain are aligned with the Company’s ethical business practices and are able to identify and mitigate the risk of modern slavery within their own businesses and supply chains.

#### U&C’s Commitments

Committed to fostering a world free from exploitation and injustice, the Company sets out its modern slavery commitments below which are aimed at driving positive change and ethical practices within its operations and supply chains. U&C will:

- continue to conduct initial and ongoing due diligence processes to identify and address modern slavery risks in its business and supply chains.
- continue to carry out regular assessments of its business relationships to identify potential modern slavery and human trafficking risks in its operations and supply chains.

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- engage with those who work with and for the Company to ensure that they understand and adhere to U&C values.
- collaborate with those who work with and for U&C to share best practices and collectively work towards tackling the risks of modern slavery and human trafficking.
- continue to provide training to U&C employees to enable them to recognise and respond to signs of modern slavery and human trafficking.
- investigate any reported concerns of modern slavery thoroughly, with appropriate action being taken.
- regularly review and enhance its policies, procedures, and due diligence efforts to effectively combat modern slavery and human trafficking.

## U&C's Minimum Labour Standards

U&C requires that all workers in its supply chains are treated in accordance with the requirements of all applicable laws and irrespective of their nationality or legal status, are treated fairly and equally.

The Company unequivocally prohibits the use of child labour in any form within its own operations and throughout its supply chains and requires that all workers must meet or exceed the legal minimum working age set out in applicable laws and regulations.

U&C requires that the following practices are complied with by all joint venture partners, contractors, housebuilders and suppliers:

- Workers shall not be subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary, and workers shall have the freedom to terminate their employment at any time without penalty, giving notice of reasonable length as required by their employment contract or any other contractual arrangement put in place with such workers.
- The workplace shall be free of any form of harsh or inhumane treatment such as harassment, mental or physical coercion. Sanctions that result in wage deductions or any practices of equivalent effect are strictly prohibited.
- Applicable health and safety legislation shall be complied with at all times.
- Workers shall be provided with personal protective equipment (“PPE”) where necessary for their health and safety. All PPE shall be of high quality and shall be properly maintained and regularly inspected for effectiveness. Training and guidance on the correct usage of PPE must be provided to all relevant workers.
- If recruitment and hiring is necessary, the recruitment agencies that are engaged must operate in accordance with the requirements of law and, if required, should be certified or licensed by the

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competent authority. The agencies must not engage in any behaviour that places workers at risk of forced labour or trafficking for labour exploitation.

- When hiring workers:
  - the age of the individuals must be verified to ensure that the individual meets or exceeds the legal minimum working age requirements; and
  - the immigration status of the individuals should be verified to ensure that the individual has the right to work in the relevant jurisdiction.
- Adequate documentation, such as a passport or birth certificate, as well as proof that the individual has a legal right to work in the relevant jurisdiction, must be obtained and maintained for all workers.
- Workers must not be charged any fees for recruitment, directly or indirectly, including costs associated with travel, processing official documents and work visas in both home and host countries.
- Workers will not be required to lodge deposits or security payments at any time and must not have their identity documents or other valuable belongings, including travel documentations and work permits confiscated or withheld.
- All workers must be provided with their employment contract prior to beginning work. The use of supplemental agreements to replace the terms of the employment contract (or equivalent contractual documentation) with less favourable terms is strictly prohibited.
- All workers must be provided with all benefits that are required by the relevant laws in their jurisdiction and all UK workers must be paid at least the living wage (as published by the Living Wage Foundation). In all jurisdictions outside of the UK, workers shall be paid at least the statutory minimum wage as stipulated by the applicable laws and regulations in the relevant jurisdiction.
- Clear and transparent information must be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. Wage payments must not be delayed, deferred, or withheld and only deductions, advances, and loans permitted by relevant laws or which are expressly permitted by U&C policies are permitted.
- Working hours must be consistent with the requirements of law and all overtime worked must be voluntary, unless part of a legally recognised collective bargaining agreement. Workers will be paid for all overtime worked in accordance with their employment contract or other contractual arrangement.

## U&C's Third Party Expectations

U&C acknowledge that construction and farming industries are deemed to have an elevated risk of modern slavery, due to the often complex supply chains, lack of visibility around subcontractors and engagement of

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low-skilled temporary workers. To minimise this risk, the Company requires all third parties that it engages, including joint venture partners, contractors, housebuilders and suppliers to:

- complete an extensive onboarding process to enable U&C to understand their business, supply chain and due diligence processes;
- repeat and comply with U&C's due diligence processes at required intervals;
- implement best practice standards and take all necessary steps to combat modern slavery in their supply chain;
- require their supply chains to adhere to U&C's minimum labour standards above;
- take all reasonable and appropriate steps to raise awareness within their supply chain to help to prevent and protect workers from exploitation or abuse;
- have effective controls to identify and address modern slavery in their supply chain. If exploitation or abuse of workers is identified, they must report it to U&C immediately and take steps to address it and put in place appropriate safeguards to ensure such exploitative practice is not repeated;
- continuously monitor and review their supply chain;
- provide appropriate training as to the requirements of this policy and the Modern Slavery Act 2015 to its management and workers; and
- provide U&C with evidence of their compliance with this policy and the Modern Slavery Act 2015 upon request.

U&C also include specific provisions in our contracts prohibiting the use of slave, forced, compulsory or trafficked labour and requiring compliance with the Modern Slavery Act 2015 and this policy.

All material potential contractors must complete a pre-qualification questionnaire which includes a section on modern slavery to enable U&C to understand the steps they have put in place to encourage responsible behaviour and practices in their business and supply chain.

## Collaboration

As part of U&C's commitment to identify, tackle and prevent modern slavery, the Company has worked closely with the following organisations:

- **Wellcome Trust (U&C's ultimate sole shareholder):** U&C have worked collaboratively with the Wellcome Trust to shape this policy.
- **Joint venture (JV) partners:** U&C have continuing relationships with a number of JV partners and encourage compliance with this policy.

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- **Protect:** U&C have a continuing partnership with the whistleblowing charity, Protect, who offer an independent, confidential advice line to U&C employees.

## Responsibility for the Policy

The Board of Directors of Urban&Civic plc has overall responsibility for ensuring this policy complies with its legal and ethical obligations.

Robin Butler, Managing Director of Urban&Civic plc, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and procedures to ensure they are effective in countering modern slavery in U&C's supply chains.

## Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

You are required to prevent, detect and report any suspected or identified exploitation or abuse of workers in your business or supply chains to us immediately. Where appropriate, and with the welfare and safety of local workers as a priority, U&C may provide support and guidance to help you address coercive or exploitative work practices in your business and/or supply chains or the Company may refer you to appropriate agencies for support and guidance.

You must avoid any activity that might lead to, or suggest, a breach of this policy or the Modern Slavery Act 2015.

## Communication and Awareness of this Policy

U&C's commitment to tackling the risks of modern slavery in its business and supply chains will be communicated to all contractors at the outset of our business relationship with them and reinforced at regular intervals thereafter. The Company will require all joint venture partners, contractors, housebuilders and suppliers to provide annual declarations confirming that they have upheld and continue to comply with our requirements in respect of modern slavery.

This policy will be reviewed annually to ensure its effectiveness and relevance to our business. The Company may terminate its relationship with individuals and organisations that it engages with if they fail to comply with this policy.

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