

URBAN&CIVIC PLC (“the Company” or “Urban&Civic”)

Annual Modern Slavery Statement

Urban&Civic plc and all companies within its group of companies are committed to tackling the risks of modern slavery, both within the business and throughout its supply chains. We recognise the need to operate to the highest standards morally, ethically and lawfully across all the work we do and in all our business dealings and relationships. We expect those we work with to uphold our standards within their own operations.

This statement is a combined group statement on behalf of both Urban&Civic plc and its subsidiary companies (a list of which is attached) and is made pursuant to our obligations under the Modern Slavery Act 2015 in respect of the financial year ending 30 September 2024. It was approved by our Directors on 28 July 2025.

Our Structure

Urban&Civic plc is a UK based property development and investment company registered in Scotland (registration number: SC149799), with approximately 95 subsidiary companies throughout the UK. The total number of direct employees of the Urban& Civic group is currently 121. Urban&Civic is owned by the Wellcome Trust, registered with the Charity Commission (registered number 210183).

Our Business Model and Stakeholders

Urban&Civic is the leading Master Developer of large-scale strategic sites in the UK, undertaking responsibility for obtaining planning and delivering the sustainable green, grey and community infrastructure to establish high quality, sustainable and community focused residential-led sites. We work with a range of national and small and medium sized housebuilders and housing associations to bring forward high quality homes across our sites using broad spectrum of contractors, consultants and utility providers at various stages of the Master Developer process. Additionally, Group operations include land promotion activities, commercial development and farming.

As a business we passionately believe in the importance of ongoing engagement; not only with our customers, contractors, consultants and utility providers, but also with our partners and the local communities in which we operate. We have regular and real time dialogue to ensure stakeholders are fully appraised of ongoing activities and project and corporate objectives and we seek to put in place contractual arrangements and obligations, where appropriate, to reinforce these project and corporate objectives. For example, in many of our contracts with housebuilders, contractors or other customers, we include “jobs brokerage” provisions so as to support local people into work within their respective operations. This collaborative approach helps us to leverage our combined involvement to promote not only employment and training, but also promote higher standards and a sense of fair play.

Urban&Civic

We currently have eleven strategic sites in delivery and eight in planning, 155 land promotion sites, two commercial sites and two farms of scale.

Our Employees

The risk of modern slavery or human trafficking in the recruitment and engagement of Urban&Civic employees is considered to be low based on a risk assessment which took into account factors such as the Company's size, operational locations and the nature of our workforce. We have Human Resource processes in place to ensure that recruitment and onboarding is completed in line with regulatory requirements and our employees are supported by a number of legally compliant policies and practices which support a high standard of working conditions and a quality employment experience. Urban&Civic are a Living Wage and London Living Wage employer.

The Company has a well-established Employee Advisory Group (the "EAG"), a representative body made up of members from across the Company to help ensure employee interests, needs and concerns are represented to the Board and Executive Management Committee, resulting in actionable insights on employment matters.

Our Supply Chains

Urban&Civic engages a range of suppliers and third parties to design and deliver construction and other services. Our direct construction contracts or farming contracts may also require our contractors to use subcontractors to assist in the delivery of their contractual obligations.

We acknowledge that the industries in which we operate, and generate financial gain from, are deemed to have an elevated risk of modern slavery, particularly given the often-complex supply chains, lack of visibility around certain subcontracting processes and employment of low-skilled temporary workers.

Given these characteristics, we consider people within our supply chains to be at higher risk than our own employees, although we continue to mitigate this risk through select ***policies and procedures*** and ***due diligence*** (during the supplier onboarding process), as detailed below.

Our Policies and Procedures

We have a number of policies and procedures which reflect our commitment to acting properly in all our business relationships and to implementing and enforcing effective systems and controls.

Our key policies and procedures, which support fair and ethical treatment and contribute to minimising the risk of modern slavery and human trafficking in our organisation and supply chain include:

- **Anti-Corruption & Bribery** – designed to ensure that Urban&Civic upholds the highest standards of professional integrity;
- **Anti-Facilitation of Tax Evasion** – designed to support Urban&Civic's commitment to acting professionally, fairly and with integrity in all its dealings and relationships and to implement and enforce effective systems to counter tax evasion facilitation;

- **Bullying & Harassment** – designed to help ensure that all of Urban&Civic’s employees and anyone we work with is treated with fairness, dignity and respect;
- **Diversity & Equal Opportunities** – designed to support a working environment that fosters fairness, equity and respect for social and cultural diversity and promotes equality in all that Urban&Civic do;
- **Ethical Labour (Internal and Supply Chain)** – designed to confirm fundamental expectations in respect of conduct for anyone working for or on behalf of Urban&Civic to promote the protection of human rights;
- **Health & Wellbeing** – designed to ensure the positive wellbeing of our employees.
- **Health & Safety** – designed to support Urban&Civic’s approach to Health & Safety and our commitment to working practices that influence strong safety performance and compliance;
- **Risk Management** – designed to keep all business activities compliant with applicable laws, regulations and codes of governance.
- **Whistleblowing** – designed to support employees in reporting any concerns of unethical behaviour.

These policies are reviewed periodically, in accordance with a documented programme, by HR, the Executive Management Committee and the Board, before circulation to all employees. This ensures compliance with both legislative changes and best practice.

The last review of the Ethical Labour Policies resulted in specific reference to prohibitions around child labour as part of wider anti-forced labour/modern slavery provisions which had previously been identified as a ‘Further Step’ in our 2023 statement. Our policies support our commitment to tackle the risks of modern slavery and human trafficking in our business and supply chain. We remain committed to acting ethically and with integrity, maintaining systems and controls that are designed to prevent modern slavery and human trafficking from taking place in our business or across our supply chains.

Our Due Diligence Processes

As part of our commitment to identify and mitigate the risk of modern slavery and human trafficking, we have put in place the following controls and processes:

- With respect to our main contractors, we operate a small pool of preferred and repeat contractors , which allows us to:
 - have a deeper understanding of those contractors and their labour practices,
 - influence their policies and attitudes to their own supply chain in this area, and
 - reinforce our values in respect of modern slavery and human trafficking.
- We undertake numerous site visits on an ad hoc basis, however, there is at least one monthly visit to coincide with monthly progress meetings.
- We actively communicate our ethical standard to our all suppliers via our onboarding processes, contracts and policies.
- All material strategic site contractors and consultants must complete a Pre-Qualification Questionnaire (PQQ) in order to be considered for preferred status. The PQQ has a number of questions dedicated to modern slavery, which seeks to provide Urban&Civic with a greater knowledge of the third party’s own supply chain and the steps they have put in place to encourage responsible behaviour and practices, including their own due diligence processes. We are currently

in the process of reviewing a PQQ process for our housebuilder customers to ensure we can obtain the same level of information and assurance from them as we do our contractors and consultants.

- We operate a tendering and contractual documentation process that requires contractors to maintain records that trace their supply chain for all direct and subcontract labour and requires them to implement an annual audit process of these records. These processes also give Urban&Civic the right to request statements of compliance and demonstration of adherence to the contractual requirements with regard to all matters concerning modern slavery. The processes also require relevant training for employees and their supply chain and also requires the implementation of a planned course of action for their employees in response to actual or suspected instances of modern slavery.
- We put in place contracts that explicitly require our contractors, consultants and housebuilders to comply with Modern Slavery Act obligations and every contract appends our Supply Chain Ethical Labour Policy, legally binding our counterparties to compliance including in reference to the national living wage.
- We maintain live preferred contractor and consultant lists which are formally reviewed periodically.
- We monitor contracts with contractors, consultants and housebuilders, with regards to their obligations in respect of modern slavery, which was identified as a further step in our previous statement.

Training and Business Conduct

We try to ensure that adequate information and training is provided to all employees on the importance of ethical business conduct.

- On joining the Company, every employee undergoes an induction process that outlines Urban&Civic's expectations around working relationships and how these must be based on high standards of personal and professional ethics.
- All employees are made aware of the Company's policies (as outlined above) as part of their induction which they must read and accept the requirements of during the period of their probation. Employees are made aware when new versions of any policies are made available and they must also sign an annual declaration which asks them to confirm that they have upheld and complied with the provisions of these policies and that there have been no breaches or potential breaches for which a declaration ought to have been made.
- Every employee at Urban&Civic is required to complete mandatory training modules through our online learning platform on modern slavery, whistleblowing and bullying and harassment. All employees must complete this training as part of onboarding and biannually thereafter. These modules include a testing element to ensure employee understanding of the risks involved and the legal requirements for businesses.
- We hold discussions (at site-based consortia meetings) with our contractors and housebuilder customers on their (and our) modern slavery policies and procedures, at least on an annual basis.

Further steps

As part of our commitment to tackle the risks of modern slavery and to ensure that we continue to reinforce our approach of doing so, we intend to further build on the processes we have put in place already and as outlined in this statement.

- Per requirements of the Economic Crime & Corporate Transparency Act 2023, which has introduced the offence of failure to prevent fraud, we will review our internal processes and prevention procedures alongside policy requirements.
- Extend the due diligence requirements identified in our tendering and contractual documentation process to both contract farming and tenancy arrangements.
- Create an appropriate process to request compliance from contractors, consultants, customers (including housebuilder customers) and tenants with the Group's Supply Chain Ethical Labour Policy.
- Look to incorporate the Ethical Labour Policy (along with other policies) into a wider Code of Conduct that sets out the Company's obligations on its suppliers on these matters and aim to build compliance with this Code into existing practices and procedures.
- Build on the current data gathering from our contractors, consultants, customers and tenants to provide annual declarations that they continue to comply with Urban&Civic's requirements in respect of modern slavery.
- Identify further opportunities for enhanced employee awareness training on modern slavery. There are certain teams and employees who by the nature of their role should receive more enhanced training.
- Look at ways in which we can build further employee engagement on modern slavery and consider how we can best use our communication channels (including Learning and Development offerings) to help support this.
- Explore possible partnerships with organisations committed to tackling modern slavery who can advise on and help develop a best practice approach.
- Look at our supplier screening process beyond its current focus on consultants, contractors and housebuilders and look to how we procure other services in the business and the due diligence process.
- Review the PQQ process for our housebuilder customers to ensure we can obtain the same level of information and assurance from them as we do our contractors and consultants.
- Engage with local police forces to provide briefings to consortia meetings (to raise awareness of issues relating to modern slavery).
- We will update our next statement where further steps have been achieved or to provide a progress update.

Peter Pereira Gray

Chairman of the Board of Directors of Urban&Civic plc

28 July 2025 as of 30 September 2024

Subsidiary undertakings

At 30 September 2024 the subsidiaries and joint ventures held directly or indirectly by the Company were as follows:

Incorporated in the United Kingdom, unless otherwise indicated	Company / partnership number	Proportion of voting rights and ordinary shares held	Nature of business
Alconbury Weald Estate Management Company Limited ^{1,6}	09950396	100%	Property management
AW Management Company (KP1C) Limited ^{1,6}	09950398	100%	Property management
AW Management Company (KP1R) Limited ¹⁶	10289840	100%	Property management
Catesby Development Land Limited ²	SC373759	100%	Property development
Catesby Estates (Developments) Limited ²	SC305339	100%	Property development
Catesby Estates (Developments II) Limited ²	SC258534	100%	Property development
Catesby Estates (Grange Road) Limited ¹	06113394	100%	Property development
Catesby Estates (Hawton) Limited ¹	04172739	100%	Property development
Catesby Estates (Newark) Limited ¹	07886101	100%	Property development
Catesby Estates plc ³	03535469	100%	Property development
Catesby Estates Promotions Limited ²	SC272763	100%	Property development
Catesby Land and Planning Limited ²	SC275580	100%	Property development
Catesby Land Limited ³	06113393	100%	Property development
Catesby Land Promotions Limited ²	SC294835	100%	Property development
Catesby Promotions Limited ²	SC309730	100%	Property development
Catesby Strategic Land Limited ³	03231740	100%	Property development
Farmcare Trading Limited ¹	09152445	100%	Farming and agriculture
Greyhound Inn Developments Limited ³	10299844	100%	Property development
III Acre Site Management Company Limited ¹	06625717	100%	Property management
Manhattan Gate Management Company Limited ¹	05778633	100%	Property management
Manydown Investco LLP ^{1,8}	OC428477	100%	Holding company
Newark Commercial Limited ³	04172735	100%	Property development
Portobello Developments 2002 Limited ⁵	04342720	100%	Property development
Priors Hall Park Management Company ^{1,6}	07301734	100%	Property management
Redlawn Land Limited ⁵	02728184	100%	Property development
T.H (Development Partnership) General Partner Limited ¹	05701869	100%	Holding company
Terrace Hill (Awdry) Holdings Limited ^{1,8}	05780799	100%	Holding company
Terrace Hill (Herne Bay) Limited ¹	07547013	100%	Property development
Terrace Hill Deansgate Operations Company Limited ^{1,8}	09335061	100%	Property management
Urban&Civic (Bradford) Limited ^{1,6}	03103400	100%	Property development
Urban&Civic (Management) Limited ²	SC149767	100%	Management and administration
Urban&Civic (Manchester New Square) Limited ¹	10820409	100%	Property development
Urban&Civic (Secretaries) Limited ²	SC154216	100%	Administration
Urban&Civic Alconbury Limited ¹	08983360	100%	Property investment and development
Urban&Civic Armadale No. 1 Limited ^{2,6}	SC383417	100%	Property development
Urban&Civic Baldock North Limited ¹	13677501	100%	Property development
Urban&Civic Bishop Auckland Limited ^{1,6}	05120788	100%	Property development
Urban&Civic Bridgend Limited ⁵	04907319	100%	Property development
Urban&Civic Buckingham Limited ¹	11210674	100%	Property development
Urban&Civic Central Funding Limited ¹	03781502	100%	Holding company
Urban&Civic Central Scotland Limited ^{2,6}	SC260481	100%	Property development
Urban&Civic Corby Limited ¹	10990162	100%	Property development
Urban&Civic Deansgate Limited ^{1,6}	06120198	100%	Property development
Urban&Civic Developments Limited ¹	02693490	100%	Property development
Urban&Civic Elstow Limited ⁵	04332152	100%	Property development
Urban&Civic Estates Land Limited ⁵	11800258	100%	Property development
Urban&Civic Estates Limited ¹	15667212	100%	Holding company
Urban&Civic Estates Projects Limited ⁵	04332147	100%	Property development
Urban&Civic Feethams Limited ^{1,6}	08241668	100%	Property investment and development
Urban&Civic Foodstores Company Limited ^{1,6}	07812710	100%	Holding company
Urban&Civic Galashiels No. 2 Limited ^{1,6}	05647842	100%	Property development
Urban&Civic GE Estates Limited ⁵	03035968	100%	Property development
Urban&Civic GE Land Limited ⁵	00571817	100%	Property development
Urban&Civic GENR Estates Limited ⁵	05654493	100%	Property development

Urban&Civic

Incorporated in the United Kingdom, unless otherwise indicated	Company / partnership number	Proportion of voting rights and ordinary shares held	Nature of business
Urban&Civic Group Limited ¹	03047676	100%	Holding company
Urban&Civic Hinxton Limited ¹	14378001	100%	Property development
Urban&Civic Holdings Limited ¹	14373341	100%	Holding company
Urban&Civic Homes Limited ⁵	03860738	100%	Property development
Urban&Civic Howick Place Investments Limited ^{1,6}	06019605	100%	Holding company
Urban&Civic Huntingdon Limited ¹	15854532	100%	Property development
Urban&Civic Investments Limited ^{1,6}	03827073	100%	Holding company
Urban&Civic JJGC Limited ⁵	01267412	100%	Property development
Urban&Civic Jobs and Skills Limited ^{1,6}	11656133	100%	Property development
Urban&Civic K L Limited ¹	13644035	100%	Property development
Urban&Civic Living BTR Limited ¹	15763883	100%	Property development
Urban&Civic Living BTR Operations Limited ¹	15933161	100%	Property development
Urban&Civic Longstanton Limited ⁵	03538959	100%	Property development
Urban&Civic Llanwern Limited ⁵	04469056	100%	Property development
Urban&Civic Manydown Limited ¹	12154336	100%	Property development
Urban&Civic Middlebeck Limited ¹	04172759	100%	Property development
Urban&Civic Middlehaven Limited ^{1,6}	05000020	100%	Holding company and property development
Urban&Civic Middlehaven Properties Limited ¹	05092362	100%	Property development
Urban&Civic Miscellaneous Properties Limited ^{1,6}	05283711	100%	Property development
Urban&Civic North East Limited ^{1,6}	03125799	100%	Holding company and property development
Urban&Civic Northam Limited ^{1,6}	09079816	100%	Property development
Urban&Civic Princess Street Limited ¹	05000023	100%	Property development
Urban&Civic Projects Limited ¹	02664039	100%	Project co-ordination and management services
Urban&Civic Property Developments Limited ^{1,6}	08257395	100%	Property development
Urban&Civic Property Developments No. 1 Limited ^{1,6}	05993086	100%	Property development
Urban&Civic Property Investments No. 4 Limited ^{1,6}	05284831	100%	Holding company
Urban&Civic Resolution Limited ¹	05177378	100%	Property development
Urban&Civic Rugby (Member) ¹ Limited ¹	08958574	100%	Property development
Urban&Civic Rugby Limited ¹	08958580	100%	Property development
Urban&Civic Sandy Limited ¹	11526026	100%	Property development
Urban&Civic St Neots Limited ¹	10717731	100%	Property development
Urban&Civic Stokesley Limited ¹	08300440	100%	Property development
Urban&Civic Tyttenhanger Limited ¹	11701516	100%	Property development
Urban&Civic UK Limited ^{1,6}	07014292	100%	Management and administration
Urban&Civic Victoria Street Limited ^{1,6}	05986544	100%	Property development
Urban&Civic Waterbeach Limited ¹	09123307	100%	Property investment and development
Urban&Civic Westview Investments Limited ¹	02902264	100%	Holding company and property development
Waterbeach Estate Management Company Limited ¹	13707519	100%	Property management
West Longstanton Limited ⁵	04735640	100%	Property development
Wixams First Limited ⁵	04404542	100%	Property development
Wixams NEA Management Company Limited ⁵	11238848	100%	Property development

1. Registered address: 50 New Bond Street, London W1S 1BJ.

2. Registered address: 115 George Street, Edinburgh EH2 4JN.

3. Registered address: Orchard House, Papple Close, Houlton, Rugby CV23 1EW.

4. Registered address: 80 Fenchurch Street, London, United Kingdom, EC3M 4AE.

5. Registered address: Hyperion House, Pegasus Court, Tachbrook Park, Warwick, CV34 6LW. These entities were acquired in the acquisition of L&Q Estates.

6. These companies are claiming an exemption from audit under sections 479A–479C of the Companies Act 2006.

7. Liquidation process commenced prior to 30 September 2024.

8. Proposal to strike-off commenced subsequent to 30 September 2024 but before the approval of the annual report and accounts.