

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

Annual approval of Modern Slavery and Human Trafficking Statement

Urban&Civic plc has a zero tolerance approach to slavery and is committed to ensuring there are no acts of slavery within any parts of its business or its supply chains.

Structure and business

Urban&Civic is a UK based property development and investment company listed on the London Stock Exchange, with its head office in London and a network of regional offices. The Urban&Civic Group (the “Group”) currently has c.80 employees. The Company delivers strategic land parcels for homes and businesses, city centre regeneration projects and commercial developments. There are currently c.120 subsidiaries in the Group. The Company does not believe that it has any activities that are considered to be at high risk of slavery or human trafficking.

Supply chain

Urban&Civic works with a wide range of joint venture partners, housebuilders, local authorities, lettings and sales agents, suppliers, purchasers and other advisors and consultants.

Policies

Urban&Civic Group policies are kept up to date and are available to all employees in the staff handbook.

The Group expects high standards of its employees and the staff handbook includes Health and Safety, Diversity, Bullying and Harassment, Anti-bribery and Whistleblowing policies. Employees are encouraged to report any concerns related to Group activities and/or supply chains of the business.

The Group has adopted an Anti-slavery and Human Trafficking Code of Conduct (Appendix 1) which sets out the ethical conduct expected of the Group and the steps to be taken to ensure that slavery and human trafficking are not taking place within the business and its supply chains. This statement and the Code of Conduct have been approved by the Board and will be reviewed annually.

The Group’s first tier suppliers are expected to comply with the Modern Slavery Act (the “MSA”) and with the Anti-slavery and Human Trafficking Code of Conduct and, where they are responsible for a second tier, to communicate to their own supply chain.

Due diligence process

The Company undertakes due diligence with any third parties when entering into contracts and communicates its zero tolerance approach to slavery to any third party with which it conducts business at the outset of any relationship. The Company requests demonstration from suppliers that they have not entered into any acts of modern slavery, human trafficking and are fully compliant with the MSA and the Urban&Civic Anti-slavery and Human Trafficking Code of Conduct. If any doubts are raised about a supplier as to whether slavery and/or human trafficking exists, and the relevant supplier does not provide evidence to the contrary, where practicable and subject to the terms of the supplier’s contract, the Group will cease arrangements with that supplier within 12 months.

If the Company is made aware of any slavery or human trafficking activities, immediate action will be taken.

Training available to staff

All Group employees have been made aware of the Modern Slavery Act and have been given a copy of the staff handbook, incorporating this statement and the Anti-slavery and Human Trafficking Code of Conduct, which sets out what to do if they suspect a case of slavery and/or human trafficking.

Group policies and procedures are designed to identify, assess and monitor potential risk areas in the business and supply chains, to reduce the risk of slavery and human trafficking occurring in the business and supply chains and to provide adequate protection for whistleblowers.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ended 30 September 2018.

Alan Dickinson – Chairman
Urban&Civic plc
23 January 2019

APPENDIX 1

URBAN&CIVIC PLC ("Urban&Civic" or "the Company")

Anti-slavery and Human Trafficking Code of Conduct

The Modern Slavery Act 2015 (the "MSA") requires public and private companies, and partnerships, which carry on business or part of a business in the UK and have a global turnover of over £36 million to disclose information detailing how they are tackling slavery and human trafficking in their supply chain.

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 has a zero tolerance approach to slavery and is committed to acting ethically and with integrity in all business relationships and to ensuring there are no acts of slavery within any parts of our business or supply chains. The Company and its employees undertake to comply with the principles of the Act. We expect all third parties that we do business with to maintain the same high standards and this Code of Conduct applies to all Directors, employees, agency workers, contractors, consultants, third party representatives and business partners.

Our systems and controls seek to ensure that modern slavery is not taking place either within our own business or in any of our supply chains. We will not enter into business with any third party making use of forced, compulsory or trafficked labour or anyone held in slavery or servitude (whether adults or children) nor do we tolerate such activity within our own business.

We will introduce obligations on our supply chain both before signing contracts with a third party and on an ongoing basis for the duration of any contract.

The Board of Directors has overall responsibility for the Code of Conduct and for ensuring that those under our control comply with both our Code of Conduct and the Act. Robin Butler, Managing Director, has primary day to day responsibility for the implementation of the Code of Conduct.

Under our Code of Conduct, employees and anyone doing business with the Company are expected to:

1. Comply with the provisions of the MSA and of this Code of Conduct;
2. Avoid any activity resulting in a breach of the requirements of the MSA or this Code of Conduct;
3. Raise any concerns about any suspicion of modern slavery in any part of our business or supply chains;
4. Prevent, detect or report any instances of modern slavery within our business or supply chains. Reporting should be to one of the following:
 - Line manager (for employees); or
 - Urban&Civic Managing Director; or
 - Principal Urban&Civic contact (for third parties);
 - Modern Slavery Helpline on 0800 0121 700
5. Raise concerns immediately if there is a suspicion of a breach to the Code of Conduct.

If any employee breaches this Code of Conduct, they will face disciplinary action which may result in dismissal for misconduct.

If any third party that we do business with breaches this Code of Conduct, where practicable and subject to the terms of their contract with us, we will terminate our relationship with them.

This Code of Conduct must be communicated to all suppliers, contractors and business partners at the commencement of our relationship with them.

Alan Dickinson – Chairman
Urban&Civic plc
23 January 2019