

URBAN&CIVIC PLC

Ethical Labour Policy

1 Policy statement

- 1.1 Modern slavery is a criminal offence 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 group companies, have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our principal contractors, housebuilders, suppliers and consultants. As part of our contracting processes, we include specific prohibitions against the use of slave, forced, compulsory or trafficked labour, and we expect that all of our principal contractors and housebuilders will hold their own suppliers, contractors, sub-contractors and labour suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, principal contractors and housebuilders.
- 1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2 Our minimum labour standards

- 2.1 All Urban&Civic migrant workers must be treated in accordance with the requirements of all applicable laws and of our HR policies and practices and will be subject to the same employment contract terms as other potential recruits.
- 2.2 All workers, Urban&Civic or otherwise, irrespective of their nationality or legal status, are required to be treated fairly and equally.
- Urban&Civic require that the following practices are complied with by all principal contractors, housebuilders, suppliers and consultants:
- 2.3 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.

- 2.4 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.
- 2.5 Workers will not be required to lodge deposits or security payments at any time and must not have their identity documents confiscated.
- 2.6 All employees must be provided with their employment contract prior to beginning work. The use of supplemental agreements aimed at undermining the terms of the employment contract are strictly prohibited.
- 2.7 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.
- 2.8 All workers must be paid at least the living wage (as published by the Living Wage Foundation) and must also be provided with all benefits that are required by law. 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 law or which are permitted by Urban&Civic policies are permitted.
- 2.9 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.
- 2.10 If the recruitment and hiring is necessary, the labour agencies that are engaged must operate in accordance with the requirements of law and, if required, should be certified or licensed by the competent authority. The agencies/labour recruiters must not engage in any behaviour that places workers at risk of forced labour or trafficking for labour exploitation.
- 2.11 We require all of our principal contractors, suppliers, consultants and housebuilders to have an appropriate system in place for ensuring their employees receive training as to the requirements of this policy and the Modern Slavery Act 2015.

3 Responsibility for the policy

- 3.1 The Board of Directors of Urban&Civic plc has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 Robin Butler, our Managing Director, has primary and day-to-day responsibility for implementing this policy.

4 Compliance with the policy by Urban&Civic employees

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

- 4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy or the Modern Slavery Act 2015.
- 4.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any contractor, consultant, supplier or housebuilder at the earliest possible stage.
- 4.4 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or Robin Butler as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our contractors and suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- 4.5 If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager or Robin Butler.
- 4.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

5 Communication and awareness of this policy for Urban&Civic employees

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all employees who are employed by Urban&Civic. We will require all employees to complete e-learning training on modern slavery.
- 5.2 Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all principal contractors at the outset of our business relationship with them and reinforced at regular intervals thereafter.
- 5.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.4 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Peter Pereira Gray

Chairman of the Board of Directors of Urban&Civic plc

21 April 2021