



Anti-Slavery and Human Trafficking Policy

2026

Contents

1. Scope.....	2
2. Governance and Responsibility.....	2
3. Policy Statement and Commitments	2
4. Process, Due diligence and Risk Assessment.....	4
5. Training and Awareness.....	5
6. Grievance Mechanisms and Reporting	5
7. Monitoring and reviews.....	6

LondonMetric Property Plc. (“LondonMetric” or the “Company”) is committed to upholding and promoting human rights throughout our operations, investments, and supply chains.

This policy reflects our adherence to international human rights standards, including the United Nations Guiding Principles on Business and Human Rights, the Modern Slavery Act 2015, the Universal Declaration of Human Rights, and the International Labour Organization’s (ILO) Core Conventions.

We believe in fostering an inclusive, respectful, and equitable working environment while ensuring that human rights risks are identified and mitigated across all areas of our business.

Our business

LondonMetric is a leading UK Real Estate Investment Trust (REIT) and FTSE 100 company listed on the London Stock Exchange.

The Company has fewer than 100 employees, all operating from its main London office and a satellite office in Birmingham, together managing a large portfolio of predominantly commercial real estate assets, located within the UK¹.

The Company primarily holds single-occupier properties leased under Full Repairing and Insuring (FRI) agreements, under which tenants are responsible for all services within their occupied spaces. Property management is mostly handled in-house. For the day-to-day management of assets with multiple occupants, which form a small part of the overall portfolio, LondonMetric partners with a select few highly skilled managing agents.

Most of the Company's direct contracts pertain to corporate operations and professional services. A very small portion of the Company's portfolio consists of land or assets that are currently being developed for income or undergoing significant refurbishment.

1. The Company owns a non-core theme park asset located in Germany.

1. Scope

This policy applies to the Company and all of its subsidiaries.

It applies to all employees (full-time, part-time, and temporary), contractors, suppliers, consultants, and any third parties acting on behalf of LondonMetric, as well as to all stakeholders involved in our operations and projects. It covers our direct business activities and extends to our relationships with third parties, joint ventures, and investment partners.

Employees who breach this policy may face disciplinary action and possible dismissal for misconduct. Stakeholders, organisations, and individuals with whom we work might see their relationship with us terminated if they breach this policy.

2. Governance and Responsibility

- **Board of Directors:** The Board oversees the implementation of this policy and ensures alignment with our strategic goals.
- **Senior Leadership Team:** Responsible for integrating human rights considerations into decision-making processes and operations.
- **Employees, contractors, suppliers, and stakeholders:** Expected to uphold the principles outlined in this policy and report any concerns promptly.

The Board receives periodic updates on modern slavery risk assessments, supplier due diligence outcomes, and grievance monitoring as part of its oversight of ESG risks.

3. Policy Statement and Commitments

Respect for Human Rights

Respect for Human Rights is fundamental to our business, and we support the principles outlined in the Universal Declaration of Human Rights and the ILO Core Conventions.

We promote equality, diversity, and inclusion throughout all operations and prohibit discrimination. We ensure fair treatment and safe working conditions for every employee and contractor that we work with. Our commitment is to treat everyone with dignity and respect.

Preventing Modern Slavery

The Company prohibits forced labour, human trafficking, child labour, and exploitation across all operations and supply chains. We require suppliers and partners to adhere to anti-slavery standards, as outlined in our [Supplier Code of Conduct](#) and conduct risk assessments and due diligence on high-risk suppliers to monitor compliance with this policy. More explicitly, we:

- Prohibit the charging of recruitment fees to workers under the Employer Pays Principle and expect suppliers to do the same.
- Prohibit the confiscation of employee identification documents and any restriction on their freedom of movement.

We also acknowledge that the use of agency labour, subcontracting, and migrant workers can significantly elevate modern slavery risks. These risk factors are considered within our due diligence approach.

Health, Safety, and Wellbeing

We are committed to providing a safe and secure environment for all, including employees and visitors, and work with tenants and suppliers to ensure they offer the same.

We prohibit any threat of violence, harassment and intimidation. We also prohibit compulsory overtime.

We implement robust health and safety policies and promote mental and physical well-being initiatives across our corporate activities.

Supply Chain Standards

We expect our suppliers and contractors to share our commitment to upholding human rights and preventing modern slavery. Key measures include:

- a. Conducting risk assessments and due diligence on suppliers, focusing on high-risk industries such as construction and facility management. We prioritise suppliers in jurisdictions or sectors with elevated risks as identified by tools such as the Global Slavery Index.
- b. Requiring suppliers to sign our Supplier Code of Conduct, which sets consequences for non-compliance.
- c. Engage in supplier audits and require compliance with our ethical procurement standards.

We are working to progressively map our supply chain beyond Tier 1, beginning with key service categories such as construction and facilities management.

We recognise that a business's own purchasing decisions, such as short lead times, limited budgets, or unclear scopes, can influence working conditions within its supply chain. Our procurement procedures establish processes to minimise such risks and engage suppliers in more ethical contracting approaches. We also welcome supplier feedback on our procurement processes, which help us improve contract design, lead time planning, and overall supplier engagement, thereby reducing indirect risks of modern slavery.

We are committed to responsible purchasing practices, including fair payment terms, reasonable mobilisation timelines, and avoiding excessive cost pressures that could increase the risk of labour

exploitation. The Company aims to establish and sustain strong connections with a select group of trusted contractors. Our goal is to develop enduring supplier partnerships that ensure transparency, stability, and ethical working environments.

Fair Working Conditions and Living Wages

We support the International Labour Organization Principles of Decent work and aim to encourage fair recruitment practices throughout our value chain, and we:

- a. Ensure all workers within our direct operations receive fair compensation that meets or exceeds the living wage in their region.
- b. Ensure fair working hours and a safe workplace for all employees.
- c. Ensure all employees have the freedom to terminate employment and have freedom of movement.
- d. Ensure the Prompt Payment Code is adopted across the business.
- e. Ensure responsible development standards are promoted within the business and its supply chain.
- f. Respect employees' right to join or not join trade unions and to engage in collective bargaining

We have the most control over our direct employees, and we ensure that all employees receive fair, performance-based remuneration, a 10% pension contribution on salary, and benefits such as private health care and life cover. Flexible working arrangements are in place around a core hours framework, and the Company has an employee handbook, which includes details on our Whistleblowing Policy. Each year, the Company also undertakes an employee survey to gauge overall employee satisfaction, and its results are summarised in the Company's Annual Responsible Business Report, which can be found on its website at www.LondonMetric.com. LondonMetric continues to score highly in areas relating to welfare and satisfaction. This survey supplements an annual one-to-one staff assessment process.

4. Process, Due diligence and Risk Assessment

Our human rights due diligence approach follows the UN Guiding Principles on Business and Human Rights framework:

- a. Identify and assess actual and potential human rights impacts.
- b. Integrate findings into procurement and risk management decisions.
- c. Track the effectiveness of actions taken.
- d. Communicate progress through our annual reporting.

We have mapped our supply chain, focusing on our Tier 1 suppliers, with whom we have direct contractual relationships. This process identified that 99% of our Tier 1 suppliers fall under UK regulations, where there are clear and firm regulations safeguarding human rights and prohibiting modern slavery and human trafficking.

We conduct risk assessments across our Tier 1 suppliers. This includes reviewing the identified geographic distribution and high-risk categories. These high-risk categories are determined based on recognised sectoral vulnerabilities and market data, primarily the Global Slavery Index. We apply a targeted supplier audit programme focusing on our high-risk construction activities. These audits target new suppliers or those not assessed for an extended period. The audit scope includes employment practices, business ethics policies and procedures, supply chain management and compliance with specific modern slavery regulations. Suppliers found to have gaps in compliance are required to implement a corrective action plan and demonstrate follow-up compliance within an agreed timeframe.

If modern slavery is identified within our operations or supply chain, we will take prompt corrective action. This may include contract review or termination, engagement with the affected supplier, and support for the impacted individual(s). We are committed to upholding the UN Guiding Principles on Business and Human Rights and will take steps to ensure that any identified victims of modern slavery have access to remedy, compensation and justice, working with expert organisations or external partners where appropriate.

Given the scale and nature of our operations, we do not currently operate a formalised external stakeholder engagement programme. Instead, engagement is undertaken on a proportionate and case-by-case basis, particularly where higher-risk activities are identified. Such engagement may include direct dialogue with suppliers, targeted review of high-risk subcontracting arrangements, and consultation with relevant industry bodies where appropriate. As our business evolves, we will continue to assess the value of broader engagement with peer networks, industry bodies, NGOs and worker representatives to further inform our risk assessment and remediation practices.

5. Training and Awareness

LondonMetric ensures relevant employees receive modern slavery training, covering key risk indicators, escalation routes, and the Company's reporting mechanisms. This enhanced training for property management and construction teams, tailored to higher-risk activities, includes site-based risk indicators, contractor oversight, and appropriate escalation procedures.

The Company is also committed to raising awareness for all employees through ongoing communication.

Contractors, suppliers, consultants, and third parties acting on behalf of LondonMetric, as well as stakeholders involved in our operations and projects, are required to ensure that their employees and supply chain receive relevant training. This includes offering training, guidance materials, and engagement sessions for employees and subcontractors in high-risk categories to help improve understanding and implementation of modern slavery standards.

6. Grievance Mechanisms and Reporting

We encourage the reporting of concerns related to human rights or modern slavery. We have expanded access to our grievance channels to third-party and supply chain workers through confidential, anonymous reporting tools. All concerns raised will be taken seriously and handled in line

with our investigation procedures. We commit to investigating all reports thoroughly and taking corrective action where necessary.

In the event that forced labour or exploitation is identified within our operations or supply chain, for example, through a subcontractor providing services at one of our properties, the immediate protection of any affected individual(s) would be the first priority. We would initiate a confidential investigation in line with our Whistleblowing Policy and, where appropriate, pause the supplier relationship pending the outcome. If the breach is substantiated, we would support affected individuals in accessing remedy through referral to relevant specialist services, require the supplier to provide appropriate redress, and review the procurement process that led to the issue.

If a substantiated case of modern slavery is identified, we will publicly disclose it, and our remediation actions and any key lessons learned will be shared with our Audit Committee and, where appropriate, publicly disclosed in our annual Modern Slavery Statement.

Our grievance mechanism is accessible via our website and through direct communication channels. Suppliers are required to communicate the availability of this channel to their workforce and subcontractors. We aim to ensure that workers can raise concerns confidentially and without fear of retaliation.

Reports can be made directly to Jadzia Duzniak, the Company Secretary and FCA Compliance Officer, at Jadzia.Duzniak@londonmetric.com. We will protect whistleblowers and ensure confidentiality in all investigations, in line with our Whistleblowing Policy.

7. Monitoring and reviews

We are dedicated to continually improving our human rights due diligence procedures and increasing transparency in our disclosures each year, in accordance with evolving best practices and stakeholder expectations. This policy will be reviewed yearly or more often if legal or business circumstances change, to ensure it reflects the latest standards and best practices in human rights and modern slavery prevention.

This policy is overseen by our Audit Committee, which ensures regular reviews.

Approved by the Audit Committee and signed by the Chief Financial Officer



Name: Martin McGann

Chief Financial Officer

Date:12.May.2026.....

Effective from May 2026