

MODERN SLAVERY

2025



Introduction

Section 54 of the UK Modern Slavery Act 2015 (the 'Act') requires Westfield Europe Ltd ("Westfield") to prepare an annual statement that details the actions it has taken during the financial year to ensure modern slavery is not taking place in its operations and supply chains.

Westfield is fully committed to playing its part in tackling modern slavery and supports the drive to encourage transparency in supply chains. We support ethical labour practices and work collaboratively with our supply chain with a shared aim of eliminating modern slavery.

Raising awareness is a key part of the work we do to mitigate the risks of modern slavery, both in our own business operations and those of our supply chain. We expect our suppliers and their sub-contractors and suppliers to be fully accountable, and to hold their own contractors to the same high standards.

This statement outlines the actions that Westfield has taken to identify, assess, address, and mitigate modern slavery for the financial year ending 31st December 2025.

About Westfield

Westfield is part of the Unibail-Rodamco-Westfield Group ("URW Group"). Westfield's business is to develop, design, construct and operate flagship real estate assets in the UK, contributing to URW Group's platform of unique, sustainability-driven retail, residential, office and lifestyle destinations that connect people through extraordinary, meaningful shared experiences.

Our supply chains are complex, extensive, and global with a different supply chain for our design, development and construction business and our asset management business. Together our supply chains comprise of consultants, contractors and sub-contractors delivering materials, equipment and services and facilities management services such as cleaning, security, car parking management, guest services and waste management.

The labour within our supply chains are entirely sourced within turnkey labour and materials / service contracts with the procurement process managed directly by in-house property management and design, development and construction procurement project / centre teams.

Key Focus Areas for 2025

1. In conjunction with our External Expert Partner, Stronger Together, further develop and implement a bespoke process and procedure to evaluate and validate supplier's Modern Slavery questionnaire responses, designed for risk assessing, risk rating and prioritisation of areas, where a Supply Chain member's pre-qualification responses are deemed to require further investigation / exploration.
2. To review Business Policies, Processes and Procedures, including our Corporate Procurement Policies to reflect the Act due diligence process and procedure now being undertaken.
3. Develop a structured Modern Slavery training framework and records, outlining who receives training, at what level and frequency including supply chain and business partners.
4. Continue to progress a remediation (victim support action plan) with our External Partner.

Our Policies, Procedures and Contracts

As an owner, developer, and operator of sustainable, high quality real estate assets, operating at the highest ethical standards is key. All employees and directors are required to comply with both Westfield and wider URW Group policies. Of particular relevance to the detection and prevention of modern slavery in Westfield's business and supply chains are the following policies and procedures:

Westfield's Modern Slavery Policy

The policy outlines our commitment to mitigate the risk of any form of slavery, servitude, forced or compulsory labour, human trafficking or related and equivalent offences that may exist within Westfield's business and / or supply chain. The policy sets out:

- An overview of the Modern Slavery Act
- Westfield's expectations of its suppliers with respect to the detection and prevention of all aspects of modern slavery
- The training available to Westfield employees and directors
- Westfield's expectations of our employees'
- What a Westfield employee should do if they have concerns about modern slavery in our operations or in our supply chain
- The consequences for Westfields employees in the event of any breach of the Modern Slavery Policy

URW Group Code of Ethics

URW Group is strictly committed to upholding all fundamental individual and labour rights protections, as well as safeguarding the health, safety, and well-being of its employees. The Code of Ethics describes the values

and principles that URW Group employees are required to respect and adhere to at all times.

The code of ethics requires, among other things, that our employees and directors:

- Behave in a way that does not harm human dignity
- Comply with all applicable laws and regulations including that of anti-bribery and corruption
- Report any circumstances or event which could reasonably be expected to create the appearance of impropriety to the UK General Counsel or URW Group Compliance Officer

URW Group Human Rights Policy

URW Group continues to follow its Human Rights Policy which outlines URW Group's dedication to human rights principles and serves as a guiding framework for all employees, contractors, partners, and stakeholders.

URW Group Responsible Purchasing Charter

URW Group continues with its Responsible Purchasing Charter as an addition to the Group Purchasing Procedures. The Charter applies to all supply chain business partners, including suppliers of goods and services, and subcontractors and sets out our expectation that they behave ethically, apply high standards of corporate conduct, and fully comply with all relevant laws. The Charter is appended or referenced in all new contracts with our supply chain.

The Charter is in line with the principles outlined in the United Nations Global Compact, the United Nations Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the Minimum Safeguards of the EU Taxonomy Regulation.

Westfield's Recruitment Policy

As part of our efforts to tackle modern slavery, Westfield adopted a responsible recruitment policy which states that recruitment costs remain a business cost and will not be charged to our employees or workers, directly or indirectly. This principle also applies in respect of the referral policy as set out in Westfield's recruitment policy, ensuring no fees are paid by employees or workers for such referrals.

URW UK Grievance and Whistleblowing

The URW UK's Whistleblowing Procedure provides a mechanism for all employees, contractors, suppliers, and stakeholders to raise concerns related to human rights in the form of a URW integrity line, which is designed to give the whistleblower the ability to communicate, while guaranteeing complete confidentiality.

Our mechanisms for reporting ethical labour concerns are designed to be open and transparent, and in line with the UN Guiding Principles.

As part of our awareness-raising activities, we also place posters displayed in different languages reflective of the workforce demographics in our offices which include national helpline numbers for individual workers to seek advice and raise concerns about potential cases of Modern Slavery.

Westfield's Modern Slavery Escalation Procedure

Westfield's Modern Slavery Escalation Procedure describes the steps to be followed if any employee suspects that anyone working for Westfield, including via business partners, suppliers and contractors, or anyone working within our assets, are being subjected to modern slavery or if a worker(s) seek help.

Other Relevant Policies

In addition to the above policies and procedures, there are ancillary policies and procedures that ensure that a minimum standard of ethical behaviour and social responsibility is adhered to, including:

URW Group Anti-Corruption Programme

Our Anti-Corruption programme augments our code of ethics and guides our employees on their conduct and reinforces our zero-tolerance approach to bribery.

Westfield's Health and Safety Policy

Westfield's Health and Safety policy outlines our commitment to high standards of health and safety in the workplace for all our employees and the broader workforce on our construction sites and at our assets.

Contracts

Westfield's standard supply contracts include, where appropriate, provisions which are specifically targeted at combating the risk of modern slavery.

In summary, the provisions require compliancy with the Modern Slavery Act and the need to notify Westfield of any actual or potential incidents, as permitted by any relevant investigating authorities.

In the event of any actual or suspected incidents Westfield reserve the right to terminate the contract. However, in the first instance Westfield would promote engaging with the supplier to correct any issues identified and provide appropriate support for them to do so, and only where there is no apparent willingness or lack of engagement to act, should contractual termination be considered. Our standard service and maintenance contracts also include the right to audit our supply chains to ensure compliance with our supplier standards.

Governance

As part of our programme of continuing development, we have reviewed our governance of modern slavery. We have reviewed membership of our Modern Slavery Strategic Working Group ("MSSWG") to include representatives from all departments that directly interface with supply chain labour.

The MSSWG is chaired by the Modern Slavery Lead and sponsored by the Head of Construction. The MSSWG has been overseeing the continuing development of Westfield's modern slavery strategy and associated risk management policies and procedures. Policies and procedures are reviewed to ensure compliance with new and the latest regulations and guidance. We liaise directly with our Expert External Partner to support this evolving knowledge.

The MSSWG may report to RMT to support the RMT in:

- Remaining informed of modern slavery and other ethical labour-related issues that are relevant to the UK business
- Monitoring and oversee progress against the UK strategic implementation plan for addressing modern slavery and other ethical labour-related issues
- Considering modern slavery and other ethical labour-related issues in relevant business plans and decisions
- Reviewing industry trends and assess their impact

The MSSWG will consult and inform the RMT on any new major developments, highlights any emerging or immediate risks, and provides information on the due diligence undertaken across the business.

Due Diligence – Assessing and Managing risk

Supply Chain Procurement and Screening

As part of our supplier selection process, we undertake pre-qualification checks to verify that suppliers have policies and procedures in place to comply with the Modern Slavery Act. Thereafter, following supplier selection, we evaluate our suppliers according to the level of inherent risk associated with the goods or services provided by the supplier e.g., if the goods or services are likely to involve engagement with vulnerable workers.

The highest priority Modern Slavery risk supply chain are assessed and identified. Any supplier rated as high risk will be required to complete a self-assessment questionnaire ("SAQ") to gather more information on the potential risks associated with their workforce and supply chain as well as information on their approach to tackling modern slavery and the mitigation they have in place to address the risks. We are then able to develop and agree (if necessary) a Corrective Action Plan based on the SAQ responses, which can then be monitored, and progress evaluated.

We reserve the right to terminate a contract where there is a sustained lack of progress against any Corrective Action Plan in place.

In all supplier contracts, regardless of size or risk, we have added a new responsible procurement clause which refers to our Responsible Purchasing Charter that outlines our expectation that suppliers behave ethically, apply high standards of corporate conduct and to fully comply with all relevant law.

Additional Due Diligence

As part of our compliance checks, we undertake a "Know Your Partner" screening on any new suppliers and contractors with contract values or anticipated yearly aggregate spend over £250,000. As part of this enhanced due diligence, the questionnaire completed online by the supply chain includes questions to enable the URW Group to evaluate any violations with respect to corruption, human trafficking, and modern slavery. Any red flags identified are escalated to URW Group's Compliance department.

In accordance with Home Office requirements, we confirm that all Westfield employees have the right to work in the UK.

On our construction sites, all sub-contractor operatives undertake a full induction process which covers all health, safety and environmental risks and includes information on modern slavery and how to report concerns or seek help on a confidential basis. Prior to the induction, all operatives are required to provide pre-induction information about themselves, their proposed role on the project, relevant CSCS card and identity documents.

Competency checks are carried out at intervals during the year to ensure that workers have the appropriate Construction Skills Certification Scheme (CSCS) card for the work they are identified to undertake on the induction form. For Centre Operations, similar checks are required for individuals to complete their security checks and obtain the necessary security card to gain entry to the Centres.

Training

Training is a fundamental part of our modern slavery strategy as it is critical to raise awareness of modern slavery and other human rights risks within our business and our supply chains.

We have continued offering training for our employees, plus high- risk tenants and main (Tier One) suppliers, and we continue to deliver targeted training for those employees who have direct contact with workers in our supply chains. Training delivery has included:

- Offering targeted in person training for our procurement and front-line managers delivered by 'Stronger Together.'
- Through our sponsorship of 'Stronger Together' we offer funded online and interactive training for all Tier One suppliers and their labour providers.

Monitoring and Evaluation of Performance

The key focus areas are set by the Modern Slavery Lead for the business and monitored.

In our 2024 Modern Slavery Statement, we outlined four key focus areas, and are pleased to report our performance and progress in these areas in 2025, as follows:

1. We maintained close co-ordination with our External Expert Partner, Stronger Together, continuously assessing our policies, processes and procedures for risk assessing our supply chain. This focused work actively continues via twice annual 1:1 review's and bi-monthly Construction and Property Steering Group meetings where Westfield continue to actively contribute to, alongside the other sponsor's with cross-collaboration.
2. Our Corporate Group Procurement policies for both Property Management and Development Projects have been reviewed to now incorporate reference to URW Anti-Slavery and Human Trafficking policies and mandatory compliance with Modern Slavery due diligence processes and procedures for all employees.
3. URW have continued attendance at our External Expert Partner's training sessions which continues into 2026.
4. We have continued to work closely with our External Expert Partner, Stronger Together, to review and progress our remedy and grievance procedures. We continue to build our Remediation / Victim Support Plan for victims in the event of a Modern Slavery occurrence in the business.

We have not detected or been made aware of any actual or potential incidents of modern slavery in our operations or in our supply chain during the reporting year.

Industry Collaboration

Since 2017, Westfield has been a proud sponsor of the Stronger Together Construction and Property Programme. Stronger Together is an impact driven, not for profit organisation specialising in responsible recruitment, fair work and tackling labour exploitation.

Our Next Steps

At Westfield we are committed to the highest ethical standards and will continue to review the effectiveness of our policies procedures and training to improve our ability to detect and mitigate any risks of modern slavery within our business and our supply chain.

Vision

Our vision for 2026 and beyond is to continue taking all practicable steps to strengthen our ability to meet the standard “Evolving Good Practice” outlined by the Office of the Independent Anti-Slavery Commissioner (IASC) as:

- External challenge or working groups informing strategy
- Going beyond auditing – deep dives and unannounced visits
- Cascading ethical standards throughout supply chains
- In-depth training for staff in key roles, such as Procurement
- Commitment to worker engagement
- Implementing the Employer Pays principle

We welcome the new Government Transparency in Supply Chains guidance and continually monitor and assess our progress against level 2 reporting and how we can incorporate this into our vision for 2026.

For 2026 we have identified the following key actions:

1. In view of the organisational changes with the UK becoming part of the Northern Europe Region, and the 2025 acquisition of a stake in St. James Quarter, Edinburgh, a further development of a structured training framework and schedule, outlining who receives training, at what level and frequency including supply chain and business partners is required.
2. To conclude and publish our Remediation / victim support action plan that is being progressed with advice from our External Expert Partner. To review and conclude a good practice grievance mechanism to align with national and international legislative requirements.

Westfield publishes this statement on behalf of its UK operations in accordance with section 54 of the UK Modern Slavery Act 2015 for the financial year ending 31st December 2025.

Vincent Jean-Pierre
Chief Operating Officer UK & Northern Europe
Westfield Europe Limited