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White City Acquisitions Limited

Modern Slavery Statement

Financial Year Ending 31 December 2024

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Introduction and Background

White City Acquisitions Limited ("**WCAL**") supports the objectives of the United Kingdom's (the "**UK**") Modern Slavery Act 2015 (the "**Modern Slavery Act**"); to detect and prevent the crimes of slavery, servitude, forced or compulsory labour, human trafficking and related and equivalent offences (collectively the "**Offences**"). WCAL supports the related drive to encourage transparency in the supply chains of commercial organisations so that the commission of Offences can be more easily detected and prevented.

This Modern Slavery Statement (the "**Statement**") relates to WCAL's activities for the financial year ended 31 December 2024 (the "**Financial Year**").

Our Business And Supply Chains

WCAL is a group undertaking of Unibail-Rodamco-Westfield SE (all group undertakings of Unibail-Rodamco-Westfield SE together comprising the "**URW Group**").The principal business activity of WCAL during the financial year ended 31 December 2024 was to be directly or indirectly acquiring, maintaining and letting property for investment purposes. The directors of WCAL believe WCAL will continue these activities for the foreseeable future.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

WCAL's approach to risk assessment, due diligence and ongoing monitoring with respect to consultants, advisers, contractors, sub-contractors, suppliers and other service providers providing goods or services to WCAL is described in more detail throughout this Statement.

Our Culture and Policies

WCAL's Culture

WCAL is committed to conducting its business in a moral, ethical and sustainable way, and recognises the need to establish and maintain corporate governance policies and business practices which reflect legal requirements in the UK and other countries in which WCAL may operate from time to time, together with the requirements of market regulators and the expectations of its stakeholders.

To that end, WCAL and the wider URW Group have various policies, codes of conduct and practices directed at ensuring that high standards of corporate governance, ethical behaviour and legal compliance are maintained. All WCAL employees and directors are required to comply with both the WCAL and the wider URW Group policies, codes of conduct and practices and failure to do so may lead to disciplinary action up to and including dismissal. Of particular relevance to the detection and prevention of the Offences in WCAL's business and supply chains are:

1. '*Modern Slavery Policy'* in the UK;
2. URW Group's '*Code of Ethics';*
3. URW Group's "*Human Rights Policy*";
4. URW Group's "*Responsible Purchasing Charter*"
5. '*Recruitment Policy'* in the UK; and
6. URW Group's '*Whistleblowing Procedure*';

each described in more detail below. These policies remain under constant review as legal requirements, regulation and good governance practices evolve.

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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 our business or supply chain. The policy sets out:

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

URW Group Code of Ethics

The Code of Ethics describes the values and principles that URW Group employees must always respect and comply with, and in all circumstances, when acting for or on behalf of URW. URW Group is strictly committed to upholding all fundamental individual and labour rights protections, as well as safeguarding health, safety, and well-being. 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 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 to the UK General Counsel or URW Group Compliance Officer any circumstance or event which could reasonably be expected to create the appearance of impropriety.

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 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 outlines our expectation that suppliers behave ethically, apply high standards of corporate conduct and fully comply with all relevant law. 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. The Charter is appended or referenced in all new contracts in our supply chain.

Recruitment Policy

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

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URW Group Whistleblowing Procedure

The URW Group'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, whilst guaranteeing complete confidentiality. The mechanisms to report ethical labour concerns are designed to be open and transparent, and in line with the UN Guiding Principles.

Due Diligence Processes For Modern Slavery

As part of our initiative to identify and mitigate risk, we have taken and will continue to take the following steps:

- We only appoint asset managers and development managers for the business of WCAL who are reputable suppliers of such services and who adhere to the WCAL's approach on modern slavery. WCAL's asset and development manager, Westfield Europe Limited ("**WEL"**) continues to comply with the UK and wider URW Group policies, that are the same as the policies that WCAL adheres to.

- We are further satisfied that training on anti-modern slavery and human trafficking policies have been undertaken by WEL.

- As asset and development manager for WCAL, WEL procures, on behalf of WCAL, other suppliers for WCAL's business activities and employs a robust procurement process, including in relation to the issues of modern slavery.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, all our Directors have been briefed on the subject.

Effectiveness Measurement

WCAL does not employ performance indicators specifically in relation to the detection and prevention of Offences in its business and supply chain, but WCAL considers that its policies, risk assessment, due diligence, risk management, training and procedures are appropriate and have been and will continue to be effective in detecting and preventing Offences in its business and supply chain. WCAL keeps all of its policies and procedures under review in order to ensure their effectiveness and will adapt such policies and procedures as necessary to ensure they remain effective as the businesses that WCAL operates and the supply chains employed by WCAL in such operation, evolve.
This statement covers 1 January 2024 to 31 December 2024 and has been approved by the board of White City Acquisitions Limited on 24 June 2025.

Signé par :
Vincent Jean-Pierre
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Vincent Jean-Pierre
Chief Operating Officer UK & Northern Europe
White City Acquisitions Limited