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HELICAL

Slavery and Human Trafficking Statement 2026

We, Helical plc (“Helical”), adopt a "zero-tolerance" approach to modern slavery and human trafficking. It continues to be a priority for Helical to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. We are also dedicated to improving our practices, where possible, to combat slavery and human trafficking in our business and supply chain. Helical is committed to working with our suppliers as appropriate to ensure that these risks are identified and managed proactively, and this ethos is firmly embedded in our culture.

This statement made pursuant to the Modern Slavery Act 2015 (the "Act") constitutes the Slavery and Human Trafficking Statement for the company, together with its subsidiaries (the “Group”), for the financial year ended 31 March 2026. As required by the Act, the Statement reports on the steps that Helical has taken during the financial year ended 31 March 2026 to combat the risk of modern slavery and human trafficking occurring in any of our supply chains or in any part of our wider business.

Our Business

Helical is listed on the London Stock Exchange and is a central London development focused real estate business based in London, UK. As at 31 March 2026, the Group had 24 employees and an annual turnover of £33,251,000.

In accordance with the s.172 Companies Act 2006 duty to promote the success of the Group, the Board takes modern slavery and human trafficking into account when making decisions, and places continuous emphasis on the importance of preventing and mitigating all potential risks associated with modern slavery in the Group's supply chain.

Risk assessment and management

The Board has identified that non-compliance with prevailing legislation, regulation and best practice on modern slavery and human trafficking could serve to impede the growth of the Group. The Board has expressly stated its commitment to the prevention and mitigation of risks associated with modern slavery and human trafficking as being a key part of Helical's strategy.

Our Group risk management framework, in conjunction with our risk management policies and procedures, provide a robust foundation for identifying risks, including emerging risks, conducting mitigation assessments, and establishing clear responsibility for risks within the management structure of the business. In accordance with the Group's risk management framework, the Board regularly assesses Helical's risks in the context of its risk appetite, and these risks include strategic, financial, operational and reputational risks. For further details on our approach to risk management, please see the latest version of Helical’s Annual Report and Accounts available on our website.

Our Supply Chains

Guided by our corporate Values, Helical is committed to conducting business in a legal, ethical and responsible manner, as well as to minimising the impacts of our supply chain on society and the environment. Our supply chains include external asset managers, project managers, contractors, subcontractors, goods and services suppliers and professional service providers.

Supporting our supply chains is important to Helical and in line with the Fair Payment Code, which sets standards for payment practices, we aim to pay invoices within 30 days of receipt. We hope that by working with our suppliers and paying them promptly we will help reduce the risk of potential unethical working practices, including modern slavery, from occurring.

We believe that the highest potential risks of modern slavery and human trafficking may exist within our construction and refurbishment contractors and subcontractors and support services, such as cleaning and maintenance.

Docusign Envelope ID: 4F4DFF70-8826-8417-82AC-41DB46C77E72

We continuously monitor the effectiveness of the steps we have taken to prevent modern slavery and human trafficking from taking place in our business and supply chains. We proactively monitor evolving legal/regulatory/industry guidance and industry action to and adapt our processes where necessary in accordance with such guidance.

Helical expects its suppliers and contractors to act ethically, with integrity and to prevent modern slavery from taking place in their own businesses or their supply chains. In advance of engaging a new supplier or contractor, Helical undertakes robust internal due diligence checks and keeps these procedures under frequent review.

As part of our contract review process, we assess contracts and counterparties against a range of risk factors, including specific modern slavery and human trafficking considerations. These include the sector in which the counterparty operates, the use of manual labour, the complexity of the supply chain and the use of subcontractors. Where a contract or counterparty is identified as a higher risk, enhanced due diligence is required, including adverse media checks.

Our contract review process also requires appropriate contractual protections to be considered, including specific modern slavery and human trafficking provisions. These provisions include requirements for suppliers and contractors to comply with applicable modern slavery legislation, apply appropriate standards within their own supply chains and notify Helical of any actual of suspected modern slavery or human trafficking connected with the relevant supply chain.

Prevention and Mitigation

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Helical has a number of policies and procedures in place which support our commitment to acting ethically and with integrity in all our business relationships. These policies are outlined below.

- Anti-Slavery and Human Trafficking Policy

  This sets out our zero tolerance approach to modern slavery and our commitment to implementing and enforcing effective systems and controls to prevent slavery and human trafficking taking place in our supply chains. The Policy is available to download from our website and is distributed to all staff.

- Employment Policy

  This confirms that we recognise the importance of the welfare of our employees and are committed to complying with all applicable laws and regulations. Our policy is to pay at least the London Living Wage to all direct employees and to encourage our suppliers to adopt an appropriate system for remuneration. The Policy also confirms that we never use forced, compulsory or child labour and ensure all labour is voluntary and is employed in accordance with applicable labour laws and international standards. The Policy is available to download from our website and is distributed to all employees in our Staff Handbook.

- Health and Safety Policy

  Helical's Health and Safety Policy aims to develop a corporate culture that is committed to the prevention of injuries and ill health to its employees or others that may be affected by its activities. The requirements of the Policy are binding for all staff, retained consultants and visitors within Helical. All sub-sections of the Policy are communicated, implemented and monitored. The Policy is available to download from our website and is distributed to all staff in our Staff Handbook. Our Health and Safety Policy is bolstered through our governance processes, specifically our Group Health and Safety Committee.

- Human Rights Policy

  Helical's commitment to respecting internationally recognised human rights standards and promoting human rights awareness within our Group and across our supply chain is set out in our Human Rights Policy. The Human Rights Policy is available to download our website and is distributed to all employees in our Staff Handbook.

Docusign Envelope ID: 4F4DFF70-8826-8417-82AC-41DB46C77E72

- Sustainability Policy

  Our Sustainability Policy sets out our goal to operate in a sustainable and responsible manner throughout all our business activities. All Suppliers are expected to support Helical in the successful delivery of our sustainability strategy "Built for the Future" and by doing so, work with us to ensure that modern slavery is not taking place anywhere our supply chains. The Sustainability Policy is available to download from our website and is distributed to all staff in our Staff Handbook.

- Anti-Bribery and Corruption Policy

  The Policy confirms Helical's zero tolerance of bribery and corruption and extends to all of our business dealings and transactions in all countries in which the Group operates. All directors, employees and third parties are required to comply with the Policy and accompanying bribery prevention procedures. The Anti-Bribery and Corruption Policy is available to download from our website and is distributed to all staff in our Staff Handbook.

- Anti-Facilitation of Tax Evasion Policy

  This policy confirms Helical's zero tolerance of the facilitation of tax evasion and extends to all our business dealings and transactions, in all countries in which we and our subsidiaries operate. All directors, employees and third parties are required to comply with the Policy. The Anti-Facilitation of Tax Evasion Policy is available to download from our website and is distributed to all employees.

- Supplier Code of Conduct

  We expect all our suppliers to share our commitment to ethical business practices. We expect our suppliers to comply with all applicable laws and regulations in which they operate as well as the principles set forth in our Supplier Code of Conduct.

  The Code sets out our expectations relating to our suppliers and their obligations in the following areas:

  - **Health and Safety** - including: training and information, avoidance of materials harmful to health, use of method statements and/or risk assessments, insurance, occupational health services and procedures for responding to and reporting accidents or emergency situations.
  - **People** - including: forced labour, child labour, working hours and payment
  - **Ethics and Legal Compliance** - including: ethical working practices, anti-bribery and corruption, money laundering and fraud, anti-facilitation of tax evasion, data protection and whistleblowing.
  - **Sustainability and the Environment** - including engagement with the community and environmental management

  It is Helical's policy to actively communicate the Code of Conduct as part of its supplier onboarding process. We reserve the right to carry out due diligence to determine the risk associated with parties within our supply chain.

  The Code is available to download from our website and is distributed to all of our suppliers and employees.

- Whistleblowing Policy

  Our Whistleblowing Policy encourages employees to report legitimate concerns over malpractice or misconduct, without fear of penalty or punishment. The Board has oversight of the Company's whistleblowing procedures and routinely review their operation.

  The Policy is available to download from our website and is distributed to all employees.

Docusign Envelope ID: 4F4DFF70-8826-8417-82AC-41DB46C77E72

Training

Our Anti-Slavery and Human Trafficking Policy, Employment Policy and Supplier Code of Conduct contain specific provisions on human rights, anti-slavery practices and employment rights. These documents are provided to all members of the Helical team at the outset and throughout their career with us.

Helical's Whistleblowing Procedures specifically provides that our employees can report concerns relating to slavery and human trafficking confidentially or anonymously via our external whistleblowing platform and our Supplier Code of Conduct sets out expected standards and obligations concerning modern slavery and human trafficking.

The effectiveness of these safeguards will continue to be monitored and the need to implement further protections will be subject to frequent review.

Monitoring

In November 2024, the Group implemented an external whistleblowing reporting platform to further encourage our employees to speak up and report concerns relating to slavery and human trafficking, confidentially or anonymously. Further details can be found in the Group's Whistleblowing Policy available to download from our website and are available in the Group's Whistleblowing Procedures.

We are pleased to confirm that no concerns have been reported via the external whistleblowing reporting platform, or via any other reporting channel.

In addition to monitoring concerns raised through our reporting channels, we continue to provide mandatory training and testing on modern slavery, so all staff understand their legal obligations under the UK's Modern Slavery Act, underlining Helical's commitment to eliminate modern slavery. During the year, 100% of eligible employees completed mandatory modern slavery training.

Looking forward

We believe that Helical has robust policies and procedures in place to safeguard our entire business, including supply chains, from slavery and human trafficking.

Although no incidents of modern slavery and human trafficking were reported during the financial year ending 31 March 2026, in line with our culture to strive for continued improvement in all areas of our business, we continuously endeavour to enhance our controls environment and reduce the risk of slavery and human trafficking in our operations and supply chains.

Looking forward, during the financial year to 31 March 2027, we will continue to:

- review our assessment of modern slavery risks within our supply chains, with particular regard to higher-risk suppliers and contractors;
- provide mandatory modern slavery training and awareness for our employees;
- apply our existing due diligence and contract review processes, including enhanced due diligence where a contract or counterparty is identified as higher risk; and
- monitor developments in legislation and best practice and update our approach where appropriate.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2026. It was approved by the Board of Directors of Helical on 18 November 2026.

Signed by:
Matthew Bonning-Snook
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Matthew Bonning-Snook, CEO