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Westfield UK & Europe Finance plc

Modern Slavery Statement

Financial Year Ending 31 December 2024

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MODERN SLAVERY STATEMENT

Financial Year ending 31 December 2024

Introduction

Westfield UK & Europe Finance plc ("**WUKEF**") supports the objectives of the United Kingdom's 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**"). WUKEF 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 WUKEF's activities for the financial year ended 31 December 2024 (the "**Financial Year**").

Our business and supply chains

WUKEF 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 WUKEF is to act as financier of group undertakings during the financial year ended 31 December 2024. The Board of Directors of WUKEF believes WUKEF will continue these activities for the foreseeable future.

WUKEF establishes a relationship of trust and integrity with all 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.

Policies In Relation to Modern Slavery

WUKEF's Culture

WUKEF 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 WUKEF may operate from time to time, together with the requirements of market regulators and the expectations of its stakeholders.

To that end, WUKEF 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 WUKEF directors are required to comply with both the WUKEF 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 WUKEF's business and supply chains are:

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

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

Code of Ethics

URW 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 each URW Group employee is required to respect and adhere to at all times.

The code of ethics requires, among other things, that each employee and director of WUKEF:

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- Behaves in a way that does not harm human dignity.
- Complies with all applicable laws and regulations including that of anti-bribery and corruption.
- Reports to the UK General Council or URW Compliance Officer any circumstance or event which could reasonably be expected to create the appearance of impropriety.

URW Group Whistleblowing Procedure

URW Group's Whistleblowing Procedure provides a mechanism for all employees, contractors, suppliers and stakeholders to raise any 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.

Modern Slavery Policy

WUKEF has adopted a "Modern Slavery Policy" which includes provisions in respect of the following:

- an overview of the Modern Slavery Act, the Offences and its application to the business;
- outlines WUKEF's expectations of its suppliers with respect to the detection and prevention of the Offences;
- explains training available to WUKEF's directors with respect to the detection and prevention of the Offences; and
- summarises the implications for WUKEF's directors in the event of any breach of the Modern Slavery Policy.

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 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 to 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.

Risk Assessment and Due Diligence Processes

Risk Assessment and Due Diligence Processes

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

- We only work with reputable suppliers and financial institutions.

- We are satisfied that the URW Group Policies are appropriate and necessary for the discharge of our duties providing financial support to the URW Group undertakings.

- Further, we are satisfied that the URW Group policies contain sufficient steps to deter any breach of such policies. Any failure to comply with such policies will result in termination of any of the contracts that they have with third parties.

It is expected that all suppliers to WUKEF are reputable, have good financial standing and are sufficiently well-resourced to enable them to comply with the demands of working with WUKEF and its policies. As part of the procurement process, WUKEF establishes a strategy having assessed the risks associated with that supply or service.

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Training

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

Effectiveness Measurement

WUKEF does not employ performance indicators specifically in relation to the detection and prevention of Offences in its business and supply chain, but WUKEF 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. WUKEF 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 WUKEF operates and the supply chains employed by WUKEF in such operation, evolve.

This statement covers 1 January 2024 to 31 December 2024 and has been approved by the board of Westfield UK & Europe Finance plc on 24 June 2025.

Signed by:
Samuel Renoux
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Samuel Renoux
Director
Westfield UK & Europe Finance plc