**MODERN SLAVERY ACT**

**SLAVERY & HUMAN TRAFFICKING STATEMENT**

NewRiver REIT Plc ("the Company") is a leading Real Estate Investment Trust with a premium listing on the London Stock Exchange. The Company specialises in buying, managing and developing resilient retail assets across the UK that provide essential goods and services whilst supporting the development of thriving communities. We are committed to preventing modern slavery and human trafficking in our business and throughout our supply chain.

The Company was founded in 2009. Following the completion of its acquisition of Capital & Regional in December 2024, NewRiver has a £0.9 billion UK wide portfolio covering 8.2 million sq ft, comprising 29 community shopping centres and 13 conveniently located retail parks occupied by tenants predominately focused on essential goods and services. In addition we manage 21 shopping centres and 17 retail parks on behalf of Capital Partners, taking our total Assets Under Management to £2.4 billion. Our objective is to own and manage the most resilient retail portfolio in the UK, focused on retail parks, core shopping centres, and regeneration opportunities in order to deliver long-term attractive recurring income returns and capital growth for our shareholders.

Being UK focused, the Company considers its geographical risk of slavery, human trafficking and child labour as being very low. We are pro-active in making our contractors and suppliers aware of areas of potential risk and all supplier and contractors are subject to our supplier vetting procedures prior to onboarding which includes checks to ensure that we work only with suppliers and contractors who are equally committed to preventing modern slavery and human trafficking.

**Our Employees**

The Company has fewer than 250 direct employees and undertakes employment document checks to ensure that these employees are in the UK legally. Our HR strategy places people at the heart of our business, enabling us to attract and retain our staff. We have numerous staff policies that protect our employees and we enjoy a high level of staff retention. The Company has established a staff forum, which meets periodically, to liaise with the Board and to create an environment to raise and discuss issues. We also have a Whistleblowing policy that encourages Staff to report any suspected wrongdoing or concerns. There have never been any concerns raised through the whistleblowing process or through any other process. All employees are made aware of the Group’s policies and procedures on joining the Company and through regular internal communications. Each year we carry out staff training on our policies including our Whistleblowing arrangements and Modern Slavery policies.

**Our Employees’ rights**

We are an equal opportunities employer and we do not discriminate on the grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, pregnancy and maternity, religion or belief, disability or age. As an ethical employer we pay above the Living Wage for all roles within the business. Recognising the benefits to Employee welfare, employee retention and to aid the elimination of excessive working hours we offer many forms of flexible working including job share, annualised hours, variation of hours and working from home. Since the pandemic we have implemented a policy of working enabling to staff to work from home a number of days a week should they choose to do so. In accordance with the International Labour Organization and International Labour standards, all employees have the right to form or join associations of their own choosing and to bargain collectively.

**External Suppliers**

Our external suppliers mainly include managing agents, developers and building contractors. The Company has detailed supplier onboarding process which requires all suppliers to confirm that they have Health, Safety and Risk policies in place along with procedures for ethical sourcing of materials, carbon management, modern slavery prevention and ethical labour practices. Copies of suppliers’ policies and insurances must be provided to the Company to ensure that they comply with their legal obligations and that they undertake the necessary checks in their organisations and supply chains with regard to slavery and human trafficking. Suppliers are required to renew these confirmations on an annual basis.

**Supplier Code of Conduct and a Modern Slavery Act 2015 Compliance Confirmation Statement**

All suppliers are required to acknowledge that they will conform with our Supplier Code of Conduct and Modern Slavery Statement (available on our website) before they can be set up on our accounts payable systems. This confirmation is renewed annually. Through our tendering and contracting procedures, suppliers are required to uphold the terms of the Supplier Code of Conduct and ensure any subcontractors they appoint do the same. These obligations are reflected in our contractual documentation.

This statement is made as required by section 54(1) of the Modern Slavery Act 2015 and constitutes NewRiver REIT plc's slavery and human trafficking statement for the financial year ended 31 March 2024.



On behalf of the Board

Chief Executive Officer

Approved by Board on 10 December 2024