

GROUP MODERN SLAVERY AND HUMAN TRAFFICKING ANNUAL STATEMENT
FOR THE FINANCIAL YEAR ENDING 30 SEPTEMBER 2025

Reporting entities

This is the modern slavery and human trafficking statement of Rightacres Property Co. Limited and all its subsidiaries and UK group companies (including, but not limited to, Rightacres Property Co. Limited, Rightacres Property Group Limited, Rightacres Investment One Limited, Rightacres Property Developments Limited, Central Quay One Limited, WILLMAC Projects Limited and Destiny Living Limited). This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 ("the Act") and has been adopted by all subsidiaries and group companies as their respective modern slavery and human trafficking statement for the financial year ending 30 September 2025.

Operations

The principal activities of Rightacres Property Co. Limited and its subsidiaries and group companies are property development, property investment and property trading.

Supply chain

Our supply chain comes from many different areas. In our dealings with our suppliers, contractors and consultants, we strive to ensure that the highest ethical standards are always achieved.

Risks of modern slavery in our operations and supply chain and actions taken to assess and address the risks

We are committed to ensuring, as far as is practically possible, that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We acknowledge our duties and responsibilities under the Act. We strive to act ethically, honestly and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure that modern slavery and human trafficking does not take place anywhere in our supply chains or business. To ensure this, we regularly request confirmation of compliance with the Act and its requirements from our main contractors and their sub-contractors and expect them to comply fully with the relevant legislative requirements. Where possible, we build strong relationships with local suppliers and contractors and make clear our expectations of business behaviour (and the importance of compliance with the Act). We do not directly employ the people who work on our development sites, but we take very seriously the adherence to the provisions of the Act by our contractors, their sub-contractors and our consultants. All our contractors have procedures in place to vet employees and sub-contractors to ensure compliance with the terms of the Act and such procedures are reviewed and improved annually. We require everyone working on our behalf to follow and uphold the intent and standards in the Act.

Most of our suppliers and contractors are based in the UK and, therefore, pose minimal risk in terms of non-compliance with the Act. Although we see our business as low risk in relation to the threat of modern slavery and human trafficking offences being committed, we are committed to carrying out compliance audits on a regular basis. We have a zero tolerance attitude to modern slavery and human trafficking and expect all those in our supply chains, contractors and consultants to comply with our aims, values and standards. We are committed to continue to review, develop and improve our policies over time to ensure continued compliance with the terms and spirit of the Act.

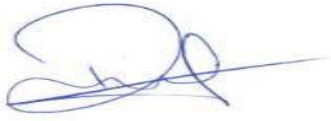
Recruitment, awareness and training

We are a small employer (with fewer than 12 employees). We have policies in place regarding employee conduct and welfare. These policies are reviewed and amended regularly to comply with our stance on forced labour, modern slavery and human trafficking.

In terms of employee recruitment, we have procedures in place to ensure that all employees are entitled to work in the UK at their own free-will and that they understand that they can cease their employment at any time in accordance with the terms of their employment contracts. Employees are compensated with salary and benefits packages that meet or exceed the statutory minimum legal requirements. We also comply with the Working Time Directive, unless employees voluntarily chose to opt-out (within the limitations imposed by the directive). Training is provided to relevant members of staff as and when required to ensure a high level of understanding

of the risks of modern slavery and human trafficking. We expect all employees to report any concerns and the Board of Directors is expected to act on them; the protection of whistle-blowers is guaranteed.

This statement has been considered, approved and adopted by the Board of Directors of all the group companies and subsidiaries for the financial year ending 30 September 2025.

A handwritten signature in blue ink, appearing to read 'Paul McCarthy', with a long horizontal stroke extending to the right.

Paul McCarthy

Chief Executive
9 October 2025