

PRIMARY HEALTH PROPERTIES PLC

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY



1. Policy statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. About this policy

The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Responsibility for the policy

The CEO has ultimate responsibility for this policy.

The Company's ESG Committee has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The [Director, ESG] has primary and day-to-day responsibility for ensuring this policy is implemented by the business, monitoring its use and effectiveness, dealing with any queries about it and proposing improvements to internal control systems where they could better address risks associated with modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the [Director, ESG].

4. Responsibilities and how to raise a concern

Our employees and those who work with us or on our behalf, must ensure they have reviewed, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

If you believe or have any suspicions that incidences of modern slavery are taking place or have taken place, you should contact the police on 101.

You can also contact the Modern Slavery Helpline on 08000 121 700 or online at:
<https://www.modernslaveryhelpline.org/report..>

If a suspicion or incidence is raised in relation to PHP, it's business or supply chain, you must notify your line manager, key contact at PHP (if you are a supplier or partner) and / or the Company Secretary, and regarding any action taken.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or [Director, ESG].

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

5. Training and communication

All employees must undertake basic training on modern slavery awareness and spotting the signs, what this policy covers and on the risk our business faces from modern slavery in its supply chains. Additional training will be provided as necessary over time.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

Harry Hyman

CEO, Primary Health Properties PLC