

## PRIMARY HEALTH PROPERTIES PLC

### MODERN SLAVERY STATEMENT 2026

#### INTRODUCTION

This is the annual statement published by Primary Health Properties PLC (“PHP”) in accordance with its obligations under the Modern Slavery Act 2015 (the “Act”). PHP fully supports the Act’s objectives to combat slavery and human trafficking and improve the transparency of reporting on modern slavery.

This Statement relates to PHP and its subsidiaries (the “Group”) and is made in respect of its financial year ended 31 December 2025. It sets out the steps PHP has taken, and is proposing to take, to address the risk of slavery and human trafficking taking place in its business and within its supply chain.

#### OUR BUSINESS AND ORGANISATION’S STRUCTURE

PHP is a FTSE 250 listed Real Estate Investment Trust which specialises in the ownership of modern purpose-built healthcare facilities, the majority of which are leased to the NHS in the UK and HSE in Ireland. The Group’s portfolio consists of over 1,100 properties across the UK and Ireland valued at £6.0 billion (as at 31 December 2025).

In 2025 PHP had 127 direct permanent employees in the UK and 29 in Ireland. The business operations consist of finance and office functions, property and facilities management, asset management and investment and development. All staff are professionally qualified (predominantly surveyors and accountants / finance professionals).

Our business is predominately within the UK and accordingly our direct geographic risk of slavery and human trafficking is considered to be low.

#### OUR SUPPLY CHAIN

The Group, pursuant to supplier consolidation and tendering activity, now has approximately 1,450 suppliers in total that support our businesses including property and asset management, development and corporate activities. Our construction and property maintenance supply chain is where we believe the main risks of slavery and human trafficking may arise and in particular where lower skilled trades may be used and where certain materials or products may be sourced from outside of the European Union (“EU”). PHP’s construction projects tend to be smaller new developments or refurbishments of existing primary healthcare facilities. These smaller projects tend to have smaller numbers of workers on site. Following recent audits of live sites, we believe there is less risk with these size of projects as they do not lend themselves to large gangs of workers being used by contractors.

PHP purchases very few materials directly, and the majority of materials are sourced through our contractor supply chain and are specified to meet the needs of our NHS and HSE occupiers in the UK and Ireland. Some materials sourced from outside of the EU may have risks of modern slavery or related issues in countries of origin. For example, we previously completed work to review solar PV products being used for refurbishment projects and identified some which have links with the Xinjiang region of China, identified as higher risk in relation to human rights issues. As a result, we identified alternative products and began to review these for new projects. The solar PV supply chain is complex and there is ongoing work to address the risks present and improve transparency across the industry and this is something we will continue to keep under active review.

PHP does not consider its risks associated with other suppliers, such as lenders, accountants and other professional service providers, to be material.

We will continue to develop our understanding of potential risks in our supply chain and take appropriate action where risks are identified. These risks are shared across industry and so where relevant we will collaborate with others to share information and learning.

## **OUR POLICIES**

PHP is committed to conducting its business in a lawful and ethical manner. This includes a zero tolerance approach in relation to slavery and human trafficking. PHP seeks to support efforts being made globally to eliminate such practices.

Our Business Ethics Policy sets out overarching commitments and requirements which we will abide by, including on human trafficking and modern slavery, and we expect our supply chain and partners to uphold these standards too.

We understand that incidents of modern slavery and forced labour in the UK have increased in recent years and, in recognition of the importance of taking a proactive approach, we adopted an Anti-Slavery and Human Trafficking Policy during 2022, which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our policies can be viewed on our website under 'Responsible Business' and we will continue to monitor and update these as necessary.

PHP expects its suppliers, contractors and service providers ("suppliers") to also support the elimination of such practices. We expect all of our suppliers to comply with our policy and a copy has been sent to them.

## **WHAT WE HAVE DONE DURING 2025**

- With the acquisition of Assura plc, we have significantly increased the size of the portfolio and the number of our suppliers. We have continued to communicate with our suppliers (for property and facilities management, asset management and development), sharing our ESG policies and specifically our Modern Slavery policy, to ensure they are aware of them and the issues they relate to. As part of our integration, we will roll out our requirements to all suppliers and continue to follow up on this..
- We continued to communicate with suppliers regarding our policies, including on anti-slavery and human trafficking, and require them to confirm their understanding and approach in relation to these matters and review our supply chain with a view to minimum standards through our membership of 'SafeContractor', which we require all our contractors to be accredited to. We will engage with the new suppliers and with our suppliers who were not yet accredited and increase the level of accreditation.
- All employees involved in projects or procurement either completed training on modern slavery and business ethics or will do so as part of the integration.
- In order to strengthen our ongoing due diligence processes we previously commissioned independent ethical labour audits on a number of live construction projects (a refurbishment and a new development). Working with a third party, Achilles, the audits are unannounced and consist of private worker engagement surveys and visual site inspections to understand and assess labour practices. No serious issues were identified at the time although some more

minor issues were raised, which PHP then communicated with contractors about to ensure they follow up. We will continue to utilise similar audits going forwards and report on them.

- PHP provided a response protocol on live new build and refurbishment construction sites and communicated with our contractors on how they should use it. This outlines the steps that should be taken should an instance of modern slavery be suspected or identified on a site to ensure the safety of potential victims and to capture learning for PHP and the project team. This will be rolled out as part of the integration.

#### **WHAT WE PLAN TO DO IN 2026**

- We will continue to communicate with the increased number of suppliers following the acquisition regarding our policies, including on anti-slavery and human trafficking and require them to confirm their understanding and their own approach.
- We will continue to encourage suppliers to undertake training on modern slavery awareness and continue to provide training for our staff.
- We will continue to make use of third-party ethical labour audits. This will apply to any new development on site during the year and a proportion of refurbishment projects with a value in excess of £1.0 million.
- We will continue to review and respond to potential risks in the material supply chain where materials and products are sourced from outside of the UK and EU.

#### **DUE DILIGENCE PROCESSES**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as servitude, forced and compulsory labour, slavery and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. PHP expects all of its suppliers, contractors and service providers to act ethically, with integrity and to have in place effective systems and controls to combat modern slavery anywhere in their own business or in any of their supply chains.

We have implemented the following safeguards:

- **Due diligence:** Before a new supplier, contractor or service provider is approved, appropriate due diligence on the supplier will be carried out. We require our contractors to be accredited by the SafeContractor Evaluation Scheme ([www.safecontractor.com](http://www.safecontractor.com)) and be listed as an accredited member on the SafeContractor database. As part of the process, the supplier's policies will be reviewed or they will be required to adhere to our policy if they do not have their own policy in this area. New suppliers will only be approved once they have completed this due diligence process.
- **Policies:** As referenced above, PHP has put in place an Anti-Slavery and Human Trafficking Policy. The policies set out PHP's expectations of its suppliers, including in relation to anti-slavery and human trafficking. Suppliers are expected to adhere to these policies to reduce the risk of slavery and human trafficking occurring in our supply chains.
- **Contractual measures:** Where we identify risks in our supply chain, PHP will endeavour, to include contractual commitments in its agreements with contractors and suppliers to ensure they and any sub-contractors or sub-suppliers comply with anti-slavery and human trafficking laws, where these are not already in place. We will also reserve the right to audit compliance wherever possible.

- **Audit:** We carry out unannounced audits, commissioned via independent third parties, of live construction sites to identify any issues relating to labour and employment practices. Where serious issues are identified or where we identify issues of concern, we may conduct follow up audits of a supplier's business (including their policies, procedures and controls in relation to labour and employment). Our current policy and commitment are to audit all new development projects once they are on site and a proportion of refurbishment projects with a value of £1.0 million or more.
- **Breaches:** PHP will view any breaches by a supplier of the PHP policy/code, or the supplier's contractual commitments (as applicable), very seriously. Were we to identify a breach of our supply chain policies or protocols, we would undertake an investigation into the circumstances, including root cause analysis. The circumstances of the breach, the results of the investigation and any process improvements and enhancements implemented as a result would be reported to the Executive Risk or ESG Committee and then to the Audit Committee and/or the Board as appropriate depending on the nature and severity of the breach.

PHP will continue to proactively monitor the safeguards listed above, including reviewing its specific policies and processes to prevent human trafficking, and consider implementation of further measures if and when required.

**Mark Davies, Chief Executive**

Primary Health Properties PLC

Approved by the Board: 24 February 2026