

Introduction

Westfield Europe Limited (“**Westfield**”) supports the objectives of the United Kingdom’s (the “**UK**”) 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**”). Westfield 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.

Raising awareness about the issue is a key element of the work that we do to improve the standards, both in our own business operations and those of our supply chain. We expect our suppliers and their subcontractors and suppliers to be accountable for their own high standards of ethics and integrity. We continue to apply the high standards of our internal policies, implementing and improving them as we receive feedback from the operations and findings during the audits that are conducted.

About Westfield

Westfield is a group undertaking of Unibail-Rodamco-Westfield SE (all group undertakings of Unibail-Rodamco-Westfield SE together comprising the “**URW Group**”). Westfield’s business is to develop, design, construct and operate flagship real estate assets in the UK that deliver great experiences for retailers, brands, consumers and residents. It has been appointed as the asset manager for the Westfield London and Westfield Stratford City retail centres (“**Centres**”).

Our supply chain is complex, extensive and global with a different supply chain for our design, development and construction business and our asset management business. These supply chains can comprise of consultants, contractors and subcontractors delivering materials, equipment and services and facilities management services such as cleaning, security, car parking management, guest services and waste management services.

Westfield’s key focus areas in 2022:

- Commissioned external auditors to undertake independent audits of in aggregate five of our higher risk (due to the nature of the sector in which they operate or on account of the number of employees, including migrant workers) Tier One suppliers across construction and operations to validate our supply chain risk assessments.
- Continued to undertake supplier assessments using our supplier assessment questionnaires.
- Continued to support industry efforts through our Stronger Together network to improve and promote greater awareness of modern slavery.
- Increased our training and awareness with employee training for key areas of our business and making available to our Tier One supply, training sessions with Stronger Together.

Our Policies

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

To that end, Westfield 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 Westfield employees and directors are required to comply with both the Westfield 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 Westfield’s business and supply chains are:

1. the URW Group’s ‘*Code of Ethics*’;
2. the URW Group’s ‘*Whistleblowing Procedure*’;
3. Westfield’s ‘*Modern Slavery Policy*’ in the UK; and
4. Westfield’s ‘*Recruitment Policy*’ in the UK,

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

Code of Ethics

The URW Group's Code of Ethics requires, among other things, that each employee and director of Westfield:

1. behaves in a way that does not harm human dignity;
2. complies with all applicable laws and regulations including that of anti-bribery and corruption;
3. reports to the UK General Counsel or URW Compliance Officer any circumstance or event which could reasonably be expected to create the appearance of impropriety; and
4. refuses to follow any instructions given or to take any actions required of them by any superior that the employee or director reasonably believes would violate applicable law and/or regulations set out in the Code of Ethics.

Modern Slavery Policy

Westfield has a '*Modern Slavery Policy*' (the "**Modern Slavery Policy**") that has been approved and adopted by its board and is reviewed regularly.

The Modern Slavery Policy:

1. provides an overview of the Modern Slavery Act;
2. outlines Westfield's expectations of its suppliers with respect to the detection and prevention of the Offences;
3. explains training available to Westfield employees and directors with respect to the detection and prevention of the Offences;
4. outlines Westfield's employees' responsibilities with respect to compliance with the Modern Slavery Act;
5. details what a Westfield employee should do if they suspect the Modern Slavery Act is not being adhered to; and
6. summarises the implications for Westfield's employees in the event of any breach of the Modern Slavery Policy.

Recruitment Policy and Processes

Following the introduction of the Modern Slavery Act, Westfield adopted a responsible recruitment policy as referenced in Westfield's Recruitment Policy. Under this policy, UK recruitment costs remain a business cost and will not be charged to Westfield's employees or workers in the UK, directly or indirectly. Westfield continues to follow its UK referral policy as set out in Westfield's Recruitment Policy in respect of referrals for roles at Westfield ensuring that no fees are paid by employees or workers for such referrals.

Other Relevant Policies

In addition to the above policies and procedures, there are ancillary policies and procedures that ensure a minimum standard of ethical behaviour and social responsibility is adhered to including but not limited to:

- Validation of the right to work of employees, workers on our construction sites and workers at the Centres, where applicable.
- Implementation of high standards of health and safety in the workplace for all employees, workers on our construction sites and workers at the Centres.

Grievances and Whistle-blowing

Westfield has an escalation and reporting procedure that provides for reporting of potential incidents of modern slavery either at a construction site or at a Centre.

Further awareness of what is modern slavery is raised by having posters on the construction sites and in the offices with helpline numbers to provide the opportunity for individual workers to raise concerns about their personal situations or for our employees to report incidents.

Whistleblowing Procedure

The URW Group's Whistleblowing Procedure encourages all Westfield employees, directors and third parties such as supply chain workers to report any matter or behaviour that they believe is a serious threat to the sound management of the URW

Group's business, including Westfield's business and including behaviour:

1. by any employee or director of Westfield; and/or
2. by any third party working on our construction sites or at the Centres.

The Whistleblowing Procedure identifies the means for reporting incidents, and assures employees and third parties of anonymity when reporting such incidents.

Formal Documents and Contracts

Westfield's standard supply contracts include, where appropriate, provisions which are specifically targeted at combating the risk of Offences being committed. In summary, the contractual provisions require each counterparty to comply with the provisions of the Modern Slavery Act and notify the other of any incidences of the Offences. In the event of any actual or suspected incidences of the Offences or of any breaches of any other provisions of the Modern Slavery Act, Westfield will have the right to terminate the relevant contract. Where Westfield is made aware of the commission of any Offence, Westfield will take appropriate measures to report the incident to the proper authorities.

Other contractual provisions may include, but are not limited to, the right to audit Westfield's supply chains for purpose of ensuring compliance with the Modern Slavery Act and in the case of the Centres, there is a requirement that suppliers pay their workers the minimum London Living Wage.

Governance

Westfield established its Modern Slavery Working Group ("**Working Group**"). The Working Group is made of representatives from our centre management, human resources, risk, procurement and legal teams. The Working Group meets on a monthly basis and has been overseeing Westfield's modern slavery approach and risk management procedures.

The Working Group reports and makes recommendations to Westfield's senior leadership team ("**CMT**") on a quarterly basis to inform the CMT of any new developments, highlight any risks and

provide information from the due diligence undertaken by the procurement teams and/or auditors.

As part of our business, we are also engaged actively with organisations such as Stronger Together and Fast Forward and our peers to establish a common approach and to implement effective measures to tackle modern slavery across the construction industry and facilities management.

Since 2017, Westfield has been a party to a sponsorship agreement with '*Stronger Together*' and has acted as a construction industry project sponsor of the '*Stronger Together*' construction industry initiative

(<http://www.stronger2gether.org/construction>), alongside other leading construction industry sponsors and supporting partners, including the '*Chartered Institute of Building*', the UK Government's '*Gangmasters and Labour Abuse Authority*' and the '*Human Trafficking Foundation*'.

As part of its role as a project sponsor during the Financial Year, Westfield has:

1. attended the monthly '*Stronger Together*' Steering Group sessions. These sessions focus on the sharing of knowledge around best practice and the discussion of ways to further promote awareness and good governance with respect to slavery, human trafficking and related issues within the construction industry; and
2. actively participated in the '*Stronger Together*' training sessions. These sessions provide the opportunity to train employees within the project sponsors' respective business and those of their respective supply chains, with a focus on preventing and tackling modern slavery in the construction industry.

Due Diligence and Risk Management

Supply Chain Procurement and Screening

In 2022, Westfield continued to assess both its existing suppliers and any new suppliers in the higher risk sectors and/or involving a significant employee population, including migrant workers.

Whenever Westfield proposes to appoint a supplier on a new engagement, Westfield follows assessment procedures appropriate to the level of risk that has been identified. Westfield currently takes the following steps for its suppliers considered to be either in the high risk trades or by high value:

i. Tender Selection Process

- a. *Tender selection*: select a group of potential suppliers to tender for the engagement;
- b. *Supplier Assessment Questionnaire*: each potential Supplier is required to complete a self-assessment questionnaire (the “SAQ”) which addresses a number of areas, including but not limited to the supplier’s procedures and processes in respect of modern slavery. In particular, the supplier has to provide information including, inter alia, whether they have a modern slavery policy, the percentage of migrant workers in their workforce and their monitoring and reporting processes.

ii. Tender

- a. *Interview*: where appropriate, each potential supplier is interviewed to assess their competency and the strength of their internal policies, including those with respect to their employees, contractors and suppliers;
- b. *References*: where appropriate each potential supplier is required to provide references from existing clients;
- c. *Site Visit*: where appropriate, Westfield visit and inspect the supplier’s facilities including their head office;
- d. *Know Your Partner*: as part of Westfield’s compliance checks, we undertake a “Know Your Partner” screening using a specialist risk and compliance tool to undertake a risk assessment of our suppliers;
- e. *Risk Assessment*: the Risk Scoring Matrix that Westfield has developed is then used in order to assess potential suppliers for their modern slavery risks based on the responses received from the SAQs.

iii. Post-Tender Checks

- a. *Right to Work*: For construction works, Westfield will confirm that the relevant individual has the right to work in the UK with the production of a valid passport and that they carry the appropriate CSCS card (Construction Skills Certification Scheme) relevant to the work they are to undertake. For the Centre operations, similar checks are required in order for the individuals to complete their security checks and obtain a security card to enter the Centres.
- b. *Induction*: All workers entering the construction sites and Centres are required to undertake an induction. The induction covers all health, safety and environmental risks and includes information on modern slavery and how to report alleged incidents on a confidential basis.

Supply Chain Monitoring and Audits

Our monitoring and auditing approach is risk-led, with a particular focus placed on higher risk trades and high risk countries from which some of our suppliers may recruit workers.

Specific and Targeted Training

Training is a fundamental component of Westfield’s approach to its business activities and is critical in raising awareness of the risk of the Offences taking place within Westfield’s own business and within its supply chain. We continue to run targeted training for our employees in our business who have direct contact with workers in our supply chains, including:

- Training for our employees on our policies and procedures on our Compliance Book and Code of Ethics with a high rate of completion.
- We have arranged for employees and suppliers to attend the Stronger Together Modern Slavery training.
- Targeted in-person training has been provided to Westfield at its premises for our front line managers and procurement teams.

18th October 2022 was Anti-Slavery Day (<https://www.antislaveryday.com/>) in the UK. As part of the ‘Stronger Together’ working group, Westfield

participated in the promotion of the initiative by displaying posters and other material to workforces on Westfield's construction projects to raise awareness of what modern slavery is.

Key Performance Indicators

Westfield does not currently employ specific key performance indicators in relation to the detection and prevention of Offences in its business and supply chain, but Westfield believes that its global compliance programme, its policies, risk assessment, due diligence, risk management and training are appropriate and have been and will continue to be effective in detecting and preventing Offences in its business and supply chain. Westfield 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 Westfield operates and the supply chains employed by Westfield in such operation, evolve.

Our Next Steps

We are committed to the highest ethical standards and will continue to review the effectiveness of our policies and procedures and training to improve our ability to detect and mitigate any risks of modern slavery within our business and our supply chain. We will continue to assess and improve our systems and approach to modern slavery on an ongoing basis.

Key next steps in 2023 include:

1. Increased training to employees, Tier One suppliers including labour agencies and Tier One suppliers' labour agencies.
2. Extend Westfield business partner due diligence using bespoke SAQs for higher risk tenants.
3. Continue to analyse the data received from responses to SAQs and apply the learnings to Westfield's business policies and practices, including a supplier code of conduct.

4. Continue to work collaboratively with our suppliers on corrective action plans following an audit or initial assessment.
5. Develop a victim support action plan for victims of modern slavery, working in collaboration with partners who are able to provide such support for victims.

Westfield publishes this statement on behalf of its UK operations in accordance with section 54 of the UK Modern Slavery Act 2015 for the financial year ending 31 December 2022.

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Jonathan Hodes

Director

Westfield Europe Limited