

# Modern Slavery and Human Trafficking Statement

**Valid from**

4 March 2025

**Updated**

annually

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

Modern slavery and human trafficking are grave violations of human rights that affect millions of people worldwide. These practices involve the exploitation of individuals through coercion, deception, and abuse of power, often for economic gain. As a responsible organisation, Aedifica is committed to combating modern slavery and human trafficking in all its forms. We recognise our duty to uphold ethical standards and ensure that our operations and supply chains are free from such practices. This statement outlines the steps we are taking to address these critical issues and demonstrates our commitment to transparency and accountability.

### **About this statement**

The Modern Slavery Act (the “**MSA**”) requires any commercial organisation in any sector, which supplies goods or services in the United Kingdom, and carries on a business or part of a business in the United Kingdom and (together with its subsidiaries) meets the annual turnover threshold of £36 million or more, to publish an annual slavery and human trafficking statement.

This Anti-Slavery and Human Trafficking Statement (“**Statement**”) is made on behalf of the UK subsidiaries of Aedifica NV/SA pursuant to Section 54 of the MSA<sup>1</sup>, but applies also to the whole of Aedifica Group. Aedifica is a Belgian listed company specialising in offering innovative and sustainable real estate concepts to our care operators and their residents across Europe, focusing in particular on housing for elderly people with care needs. We are active in Belgium, Finland, Germany, Ireland, the Netherlands, Spain and the United Kingdom.

This first annual Statement was approved by the Executive Committee of Aedifica NV/SA on 4 March 2025 and covers the reporting period 1 January 2024 to 31 December 2024. The Executive Committee will review and update it annually.

### **Our approach**

We have a zero-tolerance approach to modern slavery and human trafficking. Any form of exploitation, use of slavery, or human trafficking is unacceptable and incompatible with our business ethics.

We believe that the greatest risks of modern slavery and human trafficking are likely to occur in our supply chains. We are committed to take all reasonable steps to ensure that our supply chain is free from modern slavery and human trafficking, and we aim to work in partnership with our suppliers to develop long-term relationships with those who share our values.

Our supply chain is described in detail on p. 25 and pp. 56-57 of our Annual Financial Report 2024. The services supplied to or on behalf of our companies are generally from professional services firms located in the UK and European Union. These suppliers typically have a low risk profile for modern slavery and human trafficking compliance issues.

We conclude contracts with developers, which in turn employ contractors to build new properties, in line with our investment objectives. This represents a small part of our activities, but we recognise that in this area, there is a higher risk area for modern slavery and human trafficking.

We take the mitigating measures to reduce risks in this area, as described below.

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<sup>1</sup> See pp. 120-123 of the Annual Financial Report 2024 for a complete overview of our subsidiaries per 31 December 2024.

## **1. Our policies in relation to slavery and human trafficking**

Aedifica is committed to reducing the risk of modern slavery or human trafficking in all parts of its business, embedding requirements within key policies and take reasonable steps to engage with our supply chain to ensure that our suppliers accept and implement our policies.

The key policies – available on our website (<https://aedifica.eu/aedifica/corporate-governance/>) supporting our approach are:

- Human Rights Policy
- Speak Up Policy
- Charter for Responsible Supplier Relations
- Code of Conduct
- Anti-Bribery and Corruption Policy
- Employee Handbook

We seek to:

- comply with legislation and regulatory requirements;
- ensure that our own employees are treated fairly, with dignity and respect;
- make our supply chain aware that we promote the requirements of the legislation, and suppliers to take actions themselves to prevent modern slavery and human trafficking;
- consider the risk of modern slavery and human trafficking when making procurement decisions;
- develop awareness across the business of modern slavery and human trafficking issues; and
- incorporate modern slavery conditions into tender and contract documents.

## **2. Training of Staff**

We aim to raise awareness amongst our employees with training on a range of compliance matters including the policies set forth above.

Signed by Stefaan Gielens

Executive Director and CEO