

# THE TRAFFORD CENTRE LTD

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

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The Modern Slavery Act 2015 requires any commercial organisation in any sector, which supplies goods or services, and carries on a business or part of a business in the United Kingdom, and is above a specified total turnover, to produce and publish an annual slavery and human trafficking statement. This statement sets out the steps that The Trafford Centre Ltd has taken to prevent modern slavery and human trafficking in its business and supply chains during the financial year 1 January 2025 to 31 December 2025.

### Organisational Structure

The Trafford Centre Ltd operates a prime regional shopping centre in Trafford, Manchester, serving retail, leisure and hospitality tenants.

The Trafford Centre Ltd operates its real estate via a third-party asset manager, Pradera Lateral Limited ("Pradera") and a property manager, Savills (UK) Limited ("Savills"). The Trafford Centre Ltd is part of a group of companies.

### Our approach and commitment

We acknowledge and accept that we have a responsibility to always conduct our business with integrity and to the highest ethical standards. To that end, we are committed to taking all appropriate steps to prevent modern slavery and human trafficking from occurring in our business and supply chains.

The Trafford Centre Ltd is not an employer but its main operating contractors, as an absolute minimum, are expected to comply with all local legislation in the UK where we operate. We fully support the principles of the UN Global Compact, the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Core Conventions. We believe these commitments are fundamental.

Any breaches may be reported in accordance with our operating contractors' whistle-blowing procedures.

Our approach is one of zero-tolerance to modern slavery in our organisation and supply chain.

### Our Policies

The Trafford Centre Ltd undertakes risk assessments that include a review of modern slavery risks within its business and supply chains, to support ongoing compliance with the Modern Slavery Act 2015. Based on our most recent risk assessment, we believe that the risk of slavery or human trafficking within the operations of our principal contractors and tenant organisations is being appropriately addressed through the controls we have in place.

The Trafford Centre Ltd operates to the following standards which are relevant to the prevention of slavery and human trafficking in its operations:

### Group Procurement Approach

The Trafford Centre Ltd's approach to procuring goods and services is designed to reflect high standards of good practice when engaging with suppliers.

### Corporate Responsibility Policy

This policy is designed to ensure that The Trafford Centre Ltd conducts its business responsibly, ethically and in accordance with applicable legal and regulatory requirements.

### Whistleblowing Policy

The Trafford Centre Ltd is committed to maintaining a culture of openness, integrity and accountability, and takes allegations of wrongdoing very seriously. We recognise that employees are often the first to become aware of unethical conduct, and it is therefore important that individuals feel able to raise concerns in confidence and know that such concerns will be investigated promptly, thoroughly and appropriately.

Employees of our principal operating contractors are able to report concerns through the whistleblowing procedures established by their employer.

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### Our supply chain

The identification and prevention of modern slavery is critical when making procurement decisions such as appointing suppliers and contractors.

Suppliers engaged to provide services to The Trafford Centre Ltd or its tenants are expected to comply with minimum codes of conduct, including compliance with all applicable laws and regulations relating to modern slavery, and adherence to fair and ethical labour practices.

We encourage our suppliers and tenants to uphold standards consistent with our own, and we seek to work with partners who share our commitment to fair, lawful and ethical working practices.

We expect our suppliers to operate fair and ethical workplaces, where workers are treated with dignity and respect, and the highest standards of human rights are upheld.

Our risk-based approach assesses the likelihood of the existence of modern slavery within our supply chain on an ongoing basis. This enables us to assess suppliers and identify potential areas in which to enhance our controls, where necessary.

### Due Diligence and Ongoing Risk Management

We are committed to engaging suppliers who share our ethical standards. We therefore carry out due diligence on third-party suppliers at the start of an engagement and review this periodically thereafter.

Our standard terms of engagement require suppliers to comply with all applicable laws, including the Modern Slavery Act 2015.

Put simply, TTCL expects its suppliers to reach the same high standards that we set for ourselves.

We require third-party suppliers and contractors to complete a comprehensive pre-qualification questionnaire before appointment, and we keep that questionnaire under regular review.

If we become aware of a case of modern slavery within our supply chains, we will take appropriate action in line with our legal and ethical responsibilities.

In all cases consideration will be given to the approach that produces the safest outcome for potential victims of modern slavery. We expect our suppliers and tenants to engage with us constructively and responsibly, and to demonstrate their willingness to remedy issues, where appropriate, in a timely manner. The Trafford Centre Ltd reserves the right not to appoint, or to discontinue relationships with, suppliers that fail to meet our expectations or are unable to demonstrate progress in addressing modern slavery risks within their organisations and supply chains.

During the 2025 financial year, we did not identify any material incidents of modern slavery within our supplier and contractor onboarding or appointment processes.

### Training and awareness

We will continue to promote awareness and understanding of modern slavery risks among relevant suppliers, contractors and those involved in procurement and supplier oversight.

We also seek to ensure that those involved in procurement, supplier management and operational oversight understand the indicators of modern slavery and know how to escalate concerns appropriately.

### Future Progress

We will continue to review and strengthen our processes to mitigate the risk of modern slavery. This includes ongoing review of the risk profile of our third-party suppliers and contractors, and taking appropriate action where heightened risks are identified.

This statement was approved by the Board of Directors of The Trafford Centre Ltd on 1 June 2026.



Fraser Pearce

Director

The Trafford Centre Ltd

18 May 2026