

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1 Introduction

- 1.1 Lango Real Estate Limited (“we”/ “our”/ “us”/ “Lango”) is committed to upholding the highest standards of ethical conduct and corporate responsibility, including combating modern slavery and human trafficking in all forms.
- 1.2 This modern slavery statement (“Slavery Statement”) is made by us, and by us on behalf of all our subsidiaries as described below, pursuant to section 54 of the Modern Slavery Act 2015 (“the Act”) for the financial year ending 31 December 2024.

2 Our Organisational Structure & Business

- 2.1 We were incorporated in the United Kingdom on 26 June 2024 and became operational on 17 December 2024 when we acquired Lango Mauritius Limited. Accordingly, this is our first Modern Slavery and Human Trafficking Statement, covering the period from 17 December 2024 to 31 December 2024.
- 2.2 While our operational activities during this period were limited, and we do not believe that we met the turnover threshold requiring publication under section 54 of the Act for the 2024 financial year, we have elected to publish this statement voluntarily.
- 2.3 We remain committed to implementing appropriate due diligence and governance measures in line with best practices.
- 2.4 Lango invests in prime commercial real estate assets across key African gateway cities and operates through various subsidiaries and property holding entities in the following jurisdictions:
 - 2.4.1 Angola
 - 2.4.2 Ghana
 - 2.4.3 Nigeria
 - 2.4.4 Mauritius
 - 2.4.5 South Africa
 - 2.4.6 Seychelles
 - 2.4.7 Dubai International Financial Centre
 - 2.4.8 United Kingdom; and
 - 2.4.9 Zambia

- 2.5 In the conduct of our business operations, we engage various local and international service providers.

3 Our Commitment

- 3.1 We are committed to:

- 3.1.1 embedding ethical principles and respect for human rights throughout our business operations; and

- 3.1.2 ensuring that there is no slavery or human trafficking in our business or any of our supply chains.

- 3.2 We have a zero-tolerance policy towards modern slavery and human trafficking, and we will not do business with any person or organisation who we know to be involved in any of these activities.

- 3.3 We recognise that the risk of slavery and human trafficking is very high in certain of the jurisdictions and sectors in which we conduct our business. We are committed to continually monitor and evaluate the effectiveness of our internal policies and approach to anti-slavery so that we can improve our ability to identify, prevent, mitigate and respond more effectively to modern slavery risks.

4 Our Supply Chains

- 4.1 In the conduct of our business operations, we engage a broad network of suppliers and service providers in the jurisdictions in which we operate. These include, but are not limited to:

- 4.1.1 Property and facilities management - covering day to day operational oversight and management of our real estate assets.

- 4.1.2 Professional services - including legal advisers, financial institutions and consultants.

- 4.1.3 Office accommodation providers - including landlords and property owners from whom we lease operational premises.

- 4.1.4 Information technology and administrative services - software and cloud services providers and outsourced support functions.

- 4.1.5 Utilities - including providers of water, gas, electricity and fuel.

- 4.1.6 Commercial services - including cleaning, security, waste disposal and landscaping.

4.1.7 Construction and refurbishment - including main contractors, subcontractors, and specialist trades engaged in asset upgrades, refurbishments, maintenance and repairs.

4.2 We recognise that certain of the sectors and jurisdictions in which we operate present an elevated risk of modern slavery and labour exploitation. In particular, we acknowledge the increased risk exposure in the commercial services, construction, refurbishment, and facilities management sectors.

5 Supply Chain Evaluation and Risk Management

5.1 We recognise that sectors such as commercial services, construction, refurbishment, and facilities management sectors present relatively higher risk profiles, particularly in certain jurisdictions. Conversely, professional services and IT support are considered lower risk due to the nature of the work and the regulatory environments in which they operate.

5.2 We therefore aim to implement a risk-based approach to identify and address potential modern slavery risks in our supply chain. This will involve:

5.2.1 Risk Assessment - Differentiating between high-risk and low-risk suppliers based on sector, geography, and labour practices. High-risk sectors include commercial services, construction, refurbishment, and facilities management sectors, particularly in jurisdictions with weak labour law enforcement. Factors that we will consider include business models, labour sourcing, use of subcontractors, and vulnerable worker populations.

5.2.2 Due Diligence - For high-risk suppliers, we will look to factors which may include modern slavery statements, on-site audits, and evaluations of subcontractors and labour certifications. For lower-risk suppliers, a lighter monitoring regime may be applied. We will develop baseline due diligence standards for suppliers.

5.2.3 Supplier Code of Conduct - We intend to adopt a supplier code of conduct, which will prohibit forced labour, human trafficking, and exploitation. The code will outline our clear expectations, non-compliance consequences, and include provisions for training and awareness.

5.2.4 Ongoing Monitoring - We maintain regular dialogue with suppliers, promote continuous improvement, and adopt a victim-centric approach when addressing any violations. We will establish reporting mechanisms for employees and third parties to raise concerns.

5.2.5 Collaboration - We aim to collaborate with peers, sector organisations, and anti-slavery experts to improve our supply chain transparency and support victim remediation efforts.

5.3 We will periodically evaluate our existing supplier engagement procedures to identify opportunities for enhanced scrutiny of high-risk sectors and jurisdictions. As part of this process, we aim to integrate anti-slavery undertakings into supplier contracts going forward.

6 Policies and Governance

6.1 We acknowledge the importance of developing and maintaining an Anti-Slavery and Human Trafficking Policy as part of our regulatory compliance framework.

6.2 We have included anti-slavery provisions in certain lease agreements with tenants, reflecting our commitment to ethical practices. However, such provisions have not yet been systematically incorporated into supplier contracts.

6.3 We will implement other policies that reinforce our commitment to integrity and accountability. These include a Whistleblowing Policy, Anti-Bribery and Corruption Policy, Complaints Policy, and Ethics Policy which will collectively support ethical conduct, safeguard against misconduct, and provide mechanisms for escalation and remediation.

7 Training and Awareness

7.1 We recognise the importance of staff awareness in mitigating modern slavery risks and seek to implement an appropriate training framework for relevant personnel, including those involved in procurement, asset management, and compliance.

7.2 While formal training has not yet been rolled out, this is a priority area under review for future implementation.

8 Key Performance Indicators (KPIs)

8.1 To measure the effectiveness of our anti-slavery efforts, we intend to monitor:

8.1.1 the percentage of high-risk suppliers assessed or audited;

8.1.2 progress in developing standard contractual language on anti-slavery for supplier agreements;

8.1.3 training completion rates;

8.1.4 incidents or whistleblowing reports related to labour violations.

9 Future Commitments

9.1 We are committed to:

- 9.1.1 Finalising and adopting an Anti-Slavery and Human Trafficking Policy;
- 9.1.2 Rolling out foundational training for staff with procurement and operational duties;
- 9.1.3 Developing risk-based supplier onboarding procedures;
- 9.1.4 Implementing and publishing a supplier code of conduct;
- 9.1.5 Establishing escalation protocols for supply chain concerns.
- 9.1.6 Participate in the UK Government's Modern Slavery Statement Registry;

10 Approval and Publication

- 10.1 This Slavery Statement has been approved by the Board of Directors of Lango Real Estate Limited on 6 August 2025 in compliance with the Modern Slavery Act 2015.

Signed:



Thomas Reilly

Director, Lango Real Estate Limited

Date: 6 August 2025