

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Year ended 31 December 2025

1. Introduction

- 1.1. Lango Real Estate Limited (**Lango, we, our or us**) 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 (**Statement**) is made by Lango on behalf of itself and its subsidiaries as listed in the Annex to this Statement, pursuant to section 54 of the Modern Slavery Act 2015 (the **Act**) for the financial year ending 31 December 2025.

2. Our Organisational Structure & Business

- 2.1. Lango was incorporated in the United Kingdom on 26 June 2024 and became operational on 17 December 2024 when it acquired Lango Mauritius Limited.
- 2.2. Lango elected to voluntarily publish a Statement in respect of the financial year ended 31 December 2024, despite not having met the turnover threshold requiring publication under section 54 of the Act for that financial year. The financial year ended 31 December 2025 is the first year in which Lango has met the turnover threshold requiring publication of a Statement under section 54 of the Act.
- 2.3. Lango invests in prime commercial real estate assets across key African gateway cities and operates through various property holding entities in Angola, Ghana, Nigeria and Zambia and other subsidiaries in Mauritius, South Africa, Seychelles, Dubai International Financial Centre and the United Kingdom.
- 2.4. Lango engages various local and international service providers in the conduct of its business operations.

3. Our Commitment

- 3.1. Lango is committed to:
 - 3.1.1. embedding ethical principles and respect for human rights throughout its business operations, and



- 3.1.2. implementing appropriate due diligence and governance measures to prevent slavery or human trafficking in our business or its supply chains.
- 3.2. Lango has a zero-tolerance policy towards modern slavery and human trafficking and will not do business with any person or organisation that it knows to be involved in any of these activities.
- 3.3. Lango recognises that the risk of slavery and human trafficking is very high in certain of the jurisdictions and sectors in which it conducts its business. Lango is committed to continually monitoring and evaluating the effectiveness of its internal policies and approach to anti-slavery so that it can improve its ability to identify, prevent, mitigate and respond more effectively to modern slavery risks.

4. Our Supply Chains

- 4.1. In the conduct of its business operations, Lango engages a broad network of suppliers and service providers in the jurisdictions in which it operates. These include, but are not limited to:
 - 4.1.1. property and facilities management services covering day to day operational oversight and management of our real estate assets;
 - 4.1.2. commercial service providers including cleaning, security, waste disposal and landscaping;
 - 4.1.3. professional service providers including legal advisers, financial institutions and consultants;
 - 4.1.4. office accommodation providers including landlords and property owners from whom we lease operational premises;
 - 4.1.5. information technology and administrative service providers including software and cloud services providers and outsourced support functions;
 - 4.1.6. utilities providers including providers of water, gas, electricity and fuel; and
 - 4.1.7. construction and refurbishment service providers, including main contractors, subcontractors, and specialist trades engaged in asset upgrades, refurbishments, maintenance and repairs.
- 4.2. Lango recognises that certain of the sectors and jurisdictions in which it operates present an elevated risk of modern slavery and labour exploitation. In particular,



Lango acknowledges the increased risk exposure in the commercial services, construction, refurbishment, and facilities management sectors.

5. Supply Chain Evaluation and Risk Management

- 5.1. Lango recognises 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. Lango therefore aims to implement a risk-based approach to identify and address potential modern slavery risks in its supply chain. This involves:
 - 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 the existence of internal policies, 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 apply baseline due diligence standards for suppliers.
 - 5.2.3. *Contractual Undertakings*: We have commenced implementing standard terms in our supplier contracts prohibiting forced labour, human trafficking, and exploitation.
 - 5.2.4. *Ongoing Monitoring*: We perform periodic due diligence updates with suppliers, promote continuous improvement, and adopt a victim-centric approach when addressing any violations.
 - 5.2.5. *Complaints and Whistleblowing*: We maintain corporate policies for the management of complaints and whistleblowing, including reporting channels under our Whistleblowing Policy through which employees may raise concerns. We are in the process of establishing an independent third-party whistleblowing channel to supplement these arrangements and facilitate whistleblowing by third parties.



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 adopted an Anti-Slavery and Human Trafficking Policy on 6 August 2025 as part of our regulatory compliance framework, and updated that policy based on the advice of external consultants on 11 December 2025. In addition to this policy, we also maintain a suite of policies supporting ethical conduct, accountability, and escalation and remediation mechanisms, including:

- 6.1.1. Labour and Working Conditions Policy;
- 6.1.2. Whistleblowing Policy;
- 6.1.3. Complaints Policy;
- 6.1.4. Anti-Bribery and Corruption Policy;
- 6.1.5. Anti-Facilitation of Tax Evasion Policy; and
- 6.1.6. Anti-Money Laundering Policy.

6.2. These policies collectively support ethical sourcing, due diligence, reporting, investigation, and remediation.

6.3. We have updated our standard lease templates to include anti-slavery provisions, and these provisions will be applied to new and renewing leases from 2026. Such provisions have not yet been systematically incorporated into our supplier contracts. We are developing standardised ethical provisions, including anti-slavery requirements, for inclusion in supplier contracts going forward.

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 was not provided in 2025, this is planned for 2026 based on the updated requirements of our Anti-Slavery and Human Trafficking Policy.

8. Reporting concerns, investigation and remediation

8.1. We expect our employees and third parties to report any suspicion, concern, or evidence of modern slavery or human trafficking in our operations or supply chains via established reporting channels. Reports may be made anonymously and will be



treated with a high degree of confidentiality, and retaliation is prohibited against any person raising a concern in good faith.

8.2. Under Lango's Whistleblowing Policy, disclosures may be made to the Whistleblowing Officer (Chief Legal Officer) and are acknowledged and assessed within defined timelines, with escalation routes available depending on severity.

9. Key Performance Indicators (KPIs)

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

9.1.1. the percentage of high-risk suppliers assessed or audited;

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

9.1.3. training completion rates;

9.1.4. incidents, complaints or whistleblowing reports related to labour violations.

9.2. As 2025 is Lango's first full reporting year under section 54 of the Act, baseline data has not yet been gathered against these indicators. We intend to measure and report against these indicators from the financial year ending 31 December 2026.

10. Future Commitments

10.1. We are committed to:

10.1.1. rolling out foundational training for staff with procurement and operational duties;

10.1.2. developing risk-based supplier onboarding procedures;

10.1.3. implementing and publishing a Code of Conduct;


10.1.4. establishing escalation protocols for supply chain concerns.

11. Approval and Publication

11.1. This Statement has been approved by the Board of Directors of Lango Real Estate Limited on 12th May 2026 in compliance with the Modern Slavery Act 2015.



SIGNED on this 13th day of May 2026

Signed by:

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Thomas Reilly, Director
Lango Real Estate Limited



ANNEX - SUBSIDIARIES COVERED BY THIS STATEMENT

This Statement is made by Lango Real Estate Limited on behalf of itself and the subsidiary entities within the Lango group set out below, organised by jurisdiction of incorporation. Lango Real Estate Limited is the only entity incorporated in the United Kingdom that has met the turnover threshold for mandatory publication under section 54 of the Act for the financial year ended 31 December 2025. The inclusion of subsidiaries within the scope of this Statement reflects the group's commitment to consistent standards across its operations.

United Kingdom

- Lango Management UK Limited

Mauritius

- Accra Mall (Mauritius) Limited*
- Accra One
- AIHI Ikeja
- AttAfrica Ltd
- Clubhouse Mauritius Limited
- Delico Property Developments Limited*
- Gardens Development Mauritius Limited
- GIAP Ghana I Ltd
- Greystone One Holdings Limited
- Greystone Two Holdings Limited
- Hyprop Ikeja Mall Limited
- Icon Properties Ltd
- Lango Mauritius Limited
- Lango Management Services Limited
- Luanda One*
- Luanda Two
- Muxima Mauritius Limited
- Patriota Mauritius Limited
- Tema Retail Development Company Limited

South Africa

- Lango Management SA (Pty) Limited

Nigeria

- Greystone One Limited
- Gruppo Investment Nigeria Limited
- Oando Wings Development Limited*
- Osapa-Lekki SPV Limited*



Ghana

- Accra Mall Ltd*
- Delico Achimota Ghana Ltd*
- Agridev Real Estate Ltd*
- Clubhouse Ghana Ltd
- Delico Kumasi Ltd
- Fairllop Property Developers Ltd
- Junction Shopping Mall Ltd
- Petrostar International & Trading Ltd*
- West Hills Mall Ltd*

Zambia

- Manda Hill Centre Limited

Angola

- BMR - Gestao de Empreedime, Lda
- SWB - Comercio Industria, Lda

Dubai International Financial Centre (UAE)

- Circle Mall SPV Limited
- SB Wings Development Limited
- Wings SPV Limited

Seychelles

- Lango Zambia I Ltd

**These entities are not wholly owned by Lango and are subject to joint ownership or minority interests.*

Note: This list reflects the Lango group structure as at 31 December 2025. Where the group's economic interest in an entity is held jointly with third parties, the entity has been included on the basis that it forms part of the group's operational footprint. Entities in the process of deregistration or which are dormant are not separately identified.