

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Albert Gubay Trustee Limited as Trustee of The Albert Gubay Charitable Foundation

Introduction

Albert Gubay Trustee Limited (“the Foundation Trustee”) as Trustee of The Albert Gubay Charitable Foundation (the “Foundation”) is voluntarily publishing this statement in line with the guidance in section 54(5) of the UK Modern Slavery Act 2015 (the “Act”) in order to state the actions we have taken during the financial year to ensure modern slavery is not taking place in our operations and supply chains. Modern slavery has no place in our business or supply chains and we take a zero tolerance approach to the same. We are strongly committed to playing our part in eradicating modern slavery and maintain high standards of protocols and conduct.

This statement refers to the financial year ending 31 March 2026. It sets out the steps the Foundation has taken, and is proposing to take, to address the risk of slavery and human trafficking taking place in its business and within its supply chain.

About The Albert Gubay Charitable Foundation

The Foundation is a registered charity in England and Wales, distributing funds to charitable good causes in England, Wales, the Isle of Man, and the Republic of Ireland in accordance with the Trust Deed, which reflects the charitable wishes of its founder, Albert Gubay. Albert Gubay created the Foundation and its wholly owned subsidiaries (the “Group”) to use the business profits to maximise doing good through charitable giving. The Foundation operates 3 separate funds, the Irish Church Fund, the British Church Fund, and the General Fund. One of the ongoing grant-funding priorities during the 2026 financial year has been to support victims of modern slavery. During the financial year ending 31 March 2026, £455,000 of grant funding was allocated in furtherance of this specific grant-funding objective. This included funding for projects aimed at aiding survivors of modern slavery find immediate refuge, move into permanent accommodation, and find employment. Further grants awarded throughout the year to support homelessness and domestic abuse also indirectly benefitted survivors of modern slavery. The Foundation Trustee, acting through its Board and governed by its Articles of Association, is legally responsible for the Foundation.

The Foundation wholly owns the following companies:

Derwent Development Management Limited
Derwent Estates Limited
Derwent Management Limited
AGF Brandon Limited

AGF Brandon owns further investment subsidiaries, including Derwent Group Holdings Limited and Derwent Holdings Limited.

The operational and investment subsidiaries of the Foundation carry out property investment and development activities in respect of the retail, leisure, commercial, residential, and development land held by the Foundation. The Foundation and its wholly owned subsidiaries are run primarily from its office in Altrincham, Greater Manchester. The Foundation does not employ staff directly.

This statement is made on behalf of the Foundation and all its wholly owned subsidiaries (the “Group”).

Our supply chains

The wholly owned subsidiaries of the Foundation hold the majority of the relationships with third-party providers in carrying out its charitable and business purposes. These supply chains principally consist of the provision of services to tenants, the provision of services for asset management activities, and the provision of goods and services for development activities. Two of the wholly owned subsidiary companies, Derwent Estates and Derwent Management Limited, employ staff.

Our policy on slavery and human trafficking

The Foundation is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our Group. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all Group relationships. We have implemented and continue to enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in Group supply chains. Our Anti-Slavery Policy, which is reviewed periodically, is made available to all Group employees as part of the staff handbook.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we carefully consider which firms and companies we engage with. For significant pieces of work, we seek proposals, fee estimates, and consider the reputation from a minimum of 3 companies prior to deciding which to choose. When we issue official requests for tenders, firms or companies wanting to put forward a proposal are required to provide details of the steps they take to mitigate against the risk of slavery and human trafficking in their supply chains and provide details of any relevant statements, policies, or procedures that they have in place.

We carefully review suppliers’ letters of engagement and terms and conditions to ensure that they are contractually required to comply with the Modern Slavery Act 2015. If an existing or potential supplier fails to provide us with the required assurance, we may not enter into a contract with them or may terminate an existing relationship.

In relation to our tenants, we include a term in our precedent lease that requires compliance with the Modern Slavery Act 2015.

The Group has recruitment systems in place to prevent forced labour and to ensure that all Group employees are entitled to work in the UK or the Isle of Man. We ensure that all staff directly employed within the Group do so of their own free-will and understand that they can cease their

employment at any time under the terms of their employment contract. We compensate all staff directly employed within the Group with wages and benefit packages that meet or exceed statutory minimum requirements.

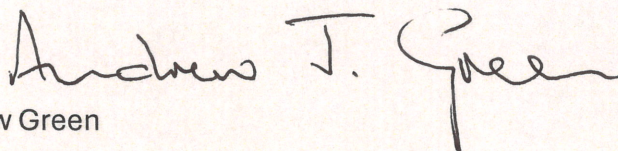
Risk management and effectiveness

As the vast majority of Group suppliers are based in the United Kingdom, we consider that they pose a minimum risk of non-compliance with the Act. Although we see our activities as low risk in relation to the threat of slavery and human trafficking offences being committed, we take the steps outlined above to minimise the risk. The Audit and Risk Committee reviews and reports on the internal controls in place throughout the Group as well as the risk management systems.

Training and goals for reviewing the effectiveness of the steps being taken

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend for all our staff to receive awareness training on the matter as a standard part of their continuous development. We support staff awareness of the risks within the Group's activities and supply chains and have policies in place to protect staff and whistleblowers within the Group. We will also regularly review Group risks and the Group's approach to assessing and mitigating the risks during the next 12 months, as well as carrying out a further review of leases in relation to tenants.

This statement is made pursuant to section 54(1) of the Act and constitutes our group's slavery and human trafficking statement for the financial year ending 31 March 2026. The statement was approved by the Board of Directors of Albert Gubay Trustee Limited on 24 June 2026.



Andrew Green

Chair of Albert Gubay Trustee Limited

Date: 8th July 2026

