

Hines Europe Limited
6, Dryden Street, London
WC2E 9NH, United Kingdom

Hines Europe Limited

Modern Slavery and Human Trafficking Statement for the Financial Year ended 31 December 2023

Introduction

This statement is made by Hines Europe Limited (“HEL”) on behalf of itself and relevant HEL subsidiaries that are subject to the requirements of Section 54 of the UK Modern Slavery Act 2015 (the “Act”) in respect of the financial year ended 31 December 2023.

Our business

HEL is part of the Hines group (“Hines”). Hines is a leading global real estate investment manager. We own and operate \$93¹ billion of assets across property types and on behalf of a diverse group of institutional and private wealth clients. Every day, our ca 5,000 employees in 31 countries draw on our 67-year history to build the world forward by investing in, developing, and managing some of the world’s best real estate.

To learn more, visit www.hines.com and follow @Hines on social media.

Our approach

Excellence, integrity, and trust are at the core of everything we do at Hines. We’ve always been committed to maintaining the highest standards of business and personal ethics as well as complying with the law and regulations wherever we do business.

Human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled. Hines respects and supports internationally recognized human rights as reflected in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

Modern slavery is an abhorrent crime and a violation of basic human rights. It is a complex, global issue, which takes many forms and includes human trafficking, forced labour and servitude. Modern slavery has no place within our organization, and we expect those who work with and for Hines to uphold and respect these standards.

Hines

¹ Includes both the global Hines organization and RIA AUM as of June 30, 2024.

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Policies

At Hines, we update our framework of policies and procedures to ensure continuous improvement. We believe that, when coupled with useful tools and engaging learning and communications, they are a fundamental ingredient in reinforcing our culture of integrity and transparency. Our policies outline the behaviours and conduct that we should expect of each other at Hines and apply to our work externally. The key policies and procedures that contribute to minimizing the risk of modern slavery and human trafficking in our organization are:

- The Hines Guiding Principles, affirming a company-wide commitment to our core values.
- The Hines Global Code of Business Conduct and Ethics, Global Anti Bribery and Corruption Policy and Whistleblowing Policy, which underscores our commitment to ensuring a workplace that supports equal opportunity, dignity, and respect; provides an overview of the regulations and policies that guide our firm; and details available methods for reporting concerns.
- HR policies and procedures: we check that all our personnel have appropriate right to work documents and ensure that they are paid fairly and enjoy a competitive remuneration package.
- The Hines Responsible Investment Statement, which reflects our commitment to performing our role as an owner and operator of real estate, and as an investment manager to our investment clients and partners, with the highest ethical standards.
- We aim to ensure that adequate information and training is provided to all our employees on relevant matters. Here are some examples of the information and training we provide:
 - Everyone working at Hines is required to complete our mandatory Code of Conduct digital learning module, which reinforces our values and the expected standards of conduct that are outlined in our policies and procedures.
 - Managers are provided with a range of leadership training and are assisted by our HR team in HR-related matters including recruitment, remuneration and employee wellbeing.

Supply Chain

We expect our suppliers to conduct their business with the highest ethical and professional standards. As such, we utilise a third-party screening and monitoring system to facilitate the identification of modern slavery risks in real time with regards to any third-party suppliers. In the UK, we do not operate a direct supply chain in relation to cleaning services, catering services or supplies of other goods and services. However, we only seek to do business with reputable companies and are constantly striving to improve our due diligence procedures on any third-party contractors that supply services to our offices.


Any financial or professional services suppliers are by nature low risk in relation to modern slavery, but nonetheless we maintain due diligence processes to ensure that our internal standards are maintained.

Risk

Hines as a global business strives to ensure that we adopt an appropriate risk-based strategy at all levels of our vertically integrated structure. This includes consideration of the risk of modern slavery and human rights offences.

We will continue to respect and support the promotion of human rights across our business globally and we hope our actions will inspire such practices worldwide.

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Lars Huber - CEO, Hines Europe Limited