

GREYSTAR EUROPE HOLDINGS LIMITED
MODERN SLAVERY STATEMENT 2024

Greystar Europe Holdings Limited (“GEHL”) issues this statement in accordance with Section 54(1) of the Modern Slavery Act 2015. This is a group statement that covers all UK and Europe-based Greystar entities (collectively referred to as “Greystar Europe”).

Greystar Europe complies with the employment laws in every country and region in which we operate. We respect and support fundamental human rights for all people, recognizing modern slavery issues, such as forced labour and human trafficking, are a significant global challenge and we conduct our business in a manner to avoid any complicity in human rights abuses. We expect our suppliers and business partners to commit to the same.

This means that we will not use forced labour, including prison, bonded, or debt labour, physical punishment or abuse, or the labour of enslaved or trafficked persons. Forced labour includes coercion such as threats, violence, and the retention of identity documents or non-payment of wages that traps a worker in a job they might otherwise want to leave. Workers must consent to employment and have the freedom to leave at any time.

This Modern Slavery Statement outlines the steps we have taken, and are undertaking, to prevent modern slavery within our group and supply chain.

OUR BUSINESS OPERATIONS AND STRUCTURE

Greystar Europe is a leading provider of rental housing and other real estate in the United Kingdom and the European Union, headquartered in London. Greystar Europe is a vertically integrated real estate platform, which offers a variety of services with respect to its real estate investments, including investment management, development and property management.

In the execution of our business operations, we engage a range of external suppliers, including:

1. Property management suppliers and maintenance contractors;
2. Professional advisors (e.g., lawyers, accountants, valuers, agents, auditors and design professionals); and
3. Building contractors within the construction industry.

We are persistent in our commitment to conducting business ethically and with integrity. Greystar Europe actively promotes measures to ensure modern slavery practices are absent within our operations and supply chain.

OUR POLICIES

We understand the role our business has in addressing modern slavery and playing our part in identifying and preventing risks.

The following policies support our commitment to eliminate modern slavery:

- Code of Conduct – makes clear our expectation that all team members conduct business in a manner consistent with the highest ethical, professional and legal standards and outlines the process for reporting issues or concerns when they arise.
- Environmental, Social and Governance Policy – sets out how environmental and social issues are integrated into and governed throughout all stages on the investment life cycle.

- Diversity Policy – makes clear that we will always seek to avoid unlawful discrimination in the employment of our team members and embrace the principles of equality and diversity.

These policies are supported by our Pillars of Excellence and Core Values, in particular our Core Value of Integrity:

- “We will stay true to the highest ethical standards and principles, and be honest, trustworthy and humble in all of our words and actions.”

OUR PEOPLE

Team Members

Greystar Europe is committed to creating value for our team members, residents, communities, and partners by improving diversity and fostering an equitable and inclusive culture. All our directly employed team members are UK or European Union-based and are predominantly site and office-based. Each member of the Greystar Europe team receives remuneration exceeding the minimum wage.

Team members are encouraged to promptly report any known or suspected violation of the Code of Conduct and any other unlawful or unethical conduct, including potential instances of modern slavery. By speaking up about potential violations of law or policy, team members help Greystar Europe address issues early on. Concerns can be raised to supervisors, Compliance or Human Resources, emailed to a confidential e-mail address, or reported confidentially via a whistleblowing hotline operated by a third party.

Company Leaders

As part of our Code of Conduct, our Company Leaders have the following responsibilities which are relevant to the issue of modern slavery:

- Create an environment where team members are comfortable speaking up and be available to hear reports of potential violations of our Code of Conduct or applicable laws.
- Create a culture of compliance and ensure team members understand that achieving business results must never be at the expense of not acting legally and ethically.
- Ensure that reports of suspected violations are immediately reported to Human Resources or Compliance, or reported through a third-party whistleblowing hotline.
- Protect reporting team members from retaliation and safeguard the confidentiality of investigations as appropriate.

ASSESSING MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

We are also committed to advancing inclusive causes within our industry, with our residents, suppliers, contractors and clients, including issues such as modern slavery.

Our supply chain predominantly consists of Tier 1 UK- and European Union-based suppliers, including construction and specialised contractors involved in real estate development, investment, refurbishment and operation. Additionally, we engage broader service providers for certain functions, including facilities and property management, encompassing preventative and reactive maintenance, utilities, health and safety, cleaning, and laundry, as well as suppliers of goods such as furniture and electricals. The majority of our business has minimal direct contact with countries that are generally considered to have a high risk of modern slavery. We adopt a risk-based approach to evaluate our supply chain and areas where modern slavery or human trafficking may

occur. Within the real estate industry supply chain, some suppliers have higher risks of modern slavery, particularly where wages are lower or where labour from outside the UK/EU is used to undertake business, including:

- Cleaning;
- Security;
- Sub-contractors for construction activities;
- Grounds Maintenance services;
- Overseas companies supplying outsourced business processing services; and
- Products typically manufactured in developing countries, such as furniture or textiles.

Our onboarding process includes questions specifically about modern slavery. All new suppliers are required to complete the onboarding process. They are asked to confirm if they have measures in place that aim to ensure that slavery, human trafficking and other human rights abuses are not taking place in their business and supply chain. They are also asked to provide a link to their Modern Slavery Statement on their website.

OUR TRAINING & ENGAGEMENT

As part of team member engagement, we offer training to team members covering various topics, including whistleblowing, our organisational values, inclusion and diversity practices, and anti-bribery and anti-corruption guidelines.

Furthermore, relevant employees are required to undergo recertification at least annually in key areas such as anti-bribery and anti-corruption.

Engagement with team members is facilitated through various channels, including regular update sessions with our senior leadership team. This fosters a culture of inclusion and openness, allowing employees to directly engage with the leadership team and seek support on any pertinent issues.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Number of cases of modern slavery discovered in our supply chains; and
- Cases reported through our whistleblowing hotline where reporters have specifically alleged a breach of the Modern Slavery Act 2015.

OUR FUTURE PLANS

We understand that we have an ongoing responsibility and remain committed to enhancing our systems, processes, and policies to mitigate the risks of modern slavery within our business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Greystar Europe’s modern slavery statement for the financial year ended 31 December 2024.

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Director
Greystar Europe Holdings Limited