

Modern Slavery Policy for Suppliers

1. Policy Statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. NewRiver REIT plc and its subsidiaries (collectively "NewRiver") have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.
- 1.2 We are also committed to ensuring transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the UK Modern Slavery Act of 2015. We expect the same high standards from all of our vendors/suppliers, contractors, subcontractors, consultants, pub partners and representatives supporting Conversant Europe (collectively "Suppliers").
- 1.3 As part of our contracting processes, we include specific provisions requiring Suppliers to ensure their compliance with applicable anti-slavery laws and regulations, and we expect our Suppliers to hold their own suppliers to the same high standards.
- 1.4 All Suppliers must comply with this Modern Slavery Policy for Suppliers (the "Policy") and with all applicable anti-slavery laws and regulations, including but not limited to the UK Modern Slavery Act of 2015.

2. Supplier Onboarding

- 2.1 Before engaging a Supplier NewRiver will complete the applicable internal company due diligence, contracting and approvals procedures. The Supplier will be required to provide NewRiver with the information necessary to allow satisfactory completion of these internal procedures.
- 2.2 As part of our risk assessment, NewRiver require terms be in place with the relevant Suppliers that bind such Suppliers to comply with all applicable anti-slavery laws, including the UK Modern Slavery Act of 2015.
- 2.3 Our Suppliers must also take reasonable steps to prevent slavery and human trafficking in any of their own supply chains or in any part of their business. Suppliers are expected to promptly address and notify NewRiver of any adverse human rights impact of their business operations.
- 2.4 In accordance with our obligations under the UK Modern Slavery Act of 2015, Hawthorn Leisure (collectively known as NewRiver") will annually publish a Modern Slavery statement, setting forth the steps we have taken to ensure that there is no modern slavery in our business or supply chains.

- 2.5 All Suppliers are required to inform us: (i) if they become aware of any information that may indicate modern slavery is occurring in their business or supply chains; and (ii) of any positive changes they make to ensure that there is no modern slavery in their business or supply chains.
- 2.6 Each Supplier is required to provide to us within sixty (60) days of request a written slavery and human trafficking report setting out the steps it has taken to ensure that slavery and human trafficking are not taking place in any of its supply chains or in any part of its business. This may include to the extent relevant, information concerning:
- (a) their business structure and supply chains;
 - (b) the policies their business has adopted to ensure that there is no modern slavery, including human trafficking, forced or indentured labour, slavery or servitude, within their respective businesses;
 - (c) the training and other measures used to ensure the policies and procedures are applied;
 - (d) the due diligence and monitoring conducted by their business to understand the relevant risk areas and confirm that no such behaviour is occurring;
 - (e) written confirmation that no modern slavery issues have been identified in their business or supply chains in the last year;
 - (f) to the extent any potential issues concerning modern slavery (including human trafficking, forced or indentured labour, slavery or servitude) have been identified within their business or supply chains, the circumstances surrounding those issues and the steps they have taken to remedy such issues; and/or
 - (g) documents evidencing the information provided in relation to the matters set out above.
3. Compliance with the Policy
- 3.1 Suppliers must ensure that they read, understand and comply with this Policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Our Suppliers are therefore required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 3.3 Suppliers are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage. We aim to encourage openness and will support any Supplier who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- 3.4 If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, Suppliers must raise it with us immediately.
- 3.5 Hawthorn Leisure (collectively known as NewRiver”) reserves the right to terminate our relationship with any individuals and/or organisations working on our behalf if they breach this Policy, including our Suppliers.



PLEASE READ AND SIGN

The Modern Slavery Act was introduced in the UK in 2015 in response to heightened concerns surrounding slavery, human trafficking and forced labour in both commercial organisations and their supply chains. The Act recognises the role that companies can play in both tackling and preventing these crimes.

The Act means that all companies now have to publish an annual slavery and human trafficking statement setting out the steps that they have taken in order to ensure that no slavery, human trafficking and/or forced labour is taking place either within their organisation and/or their supply chains. This includes all third-party suppliers and subcontractors.

Accordingly, NewRiver REIT plc and its subsidiaries including Hawthorn Leisure (collectively known as NewRiver”) has an obligation under the Act to regularly check with its suppliers, contractors and Pub Partners (collectively known as suppliers) that they have taken appropriate measures to ensure that the staff they employ have the right to work in the UK, are in the country legally and are employed under their own free will.

In order to help us comply with our obligations under the Act, we need you to sign below to confirm that:

- a) You are not in breach of the attached Modern Slavery Policy for Suppliers;
- b) You will continue to comply with the Policy at all times during your relationship with NewRiver; and
- c) You will immediately notify Hawthorn Leisure (collectively known as NewRiver”) on becoming aware of a breach of the Policy.

I confirm that I have read and understand the above Modern Slavery Policy for Suppliers and will adhere to it;

Pub Name:

Pub Address:

Partner Name(s):

Partner signature(s):