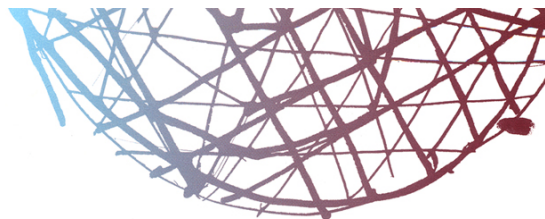


# Abstract Group of Companies

## Ethics and Corporate Social Responsibility (CSR) Policy



### 1. INTRODUCTION

1.1. The Abstract Group of Companies (“the Company”, “we”) is committed to ethical business conduct in all our operations; and to demonstrating the highest levels of integrity and honesty in order to uphold personal and corporate reputations, and to inspire confidence and trust.

### 2. SCOPE AND PURPOSE

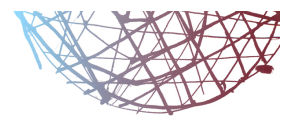
- 2.1. This policy applies to all our business operations, and to all persons or organisations who are appointed to act on behalf of the Company or any of its subsidiaries including, but not limited to, employees, directors, agents, contractors, business partners and consultants (“you”).
- 2.2. Sub-contractors and suppliers are expected to adhere to the principles of this policy in their dealings with the Company.
- 2.3. The purpose of this policy is to set out:
- 2.3.1. Our ethical and social principles and commitments;
  - 2.3.2. The standards of behaviour and integrity we expect; and
  - 2.3.3. Responsibilities for observing and upholding these standards.

### 3. OUR CODE OF CONDUCT

- 3.1. **Honesty and Integrity** – we expect you to be honest, to demonstrate personal integrity and to do what is fair, even when there may be pressure to do otherwise.
- 3.2. **Openness** – we expect you to work collaboratively and to communicate openly with all stakeholders, within the bounds of commercial confidentiality and regulatory constraints.
- 3.3. **Respect Others** – we expect you to treat everyone you meet with respect and to value the individual contributions of each person; we welcome diversity in our business.
- 3.4. **Compliance** – in all circumstances, you must observe international, national and local regulations, rules of professional ethics, and Company policies.
- 3.5. **Accountability** – we are each accountable for our actions and we expect everyone to do their part to protect the Company and our partners. If something goes wrong, we expect you to raise the issue as soon as possible to the relevant person.

### 4. OUR CSR COMMITMENTS

- 4.1. **Our People** – we provide equal opportunities and support career development, in a safe, diverse and secure workplace.
- 4.2. **Our Suppliers and Clients** – we encourage clients and suppliers to align themselves with our commitment to CSR, whilst delivering exceptional care and quality of service.
- 4.3. **Business Ethics and Governance** – we act with integrity as a business, partner, employer and corporate citizen, and in compliance with all legal obligations.
- 4.4. **Our Environment** – we aim to reduce our impacts on the environment as much as reasonably practicable, and in compliance with relevant national and local legislation.
- 4.5. **Our Communities** – we aim to be a good neighbour and active participant within the communities in which we operate.



## 5. PRACTICE

### 5.1. **Employees**

- 5.1.1. **Equality and Diversity** – we value diversity and treat everyone with fairness, respect and dignity. We strive to be representative of, and responsive to, different cultures and groups. For more information, see our Equality, Diversity and Inclusion Policy.
- 5.1.2. **Harassment** – we do not tolerate any form of abuse, harassment or discrimination. This includes actions that can be considered offensive, intimidating or discriminatory, and any form of sexual harassment.
- 5.1.3. **Recruitment** – we recruit, appoint and promote employees based solely on ability. We work to ensure all employees have an equal chance to contribute to the success of the Company and to achieve their potential within it.
- 5.1.4. **Human Rights** – we support the United Nations Universal Declaration of Human Rights and we are committed to ensuring there is no modern slavery in any part of our business or supply chain. For more information, see our Modern Slavery Policy.
- 5.1.5. **Health and Safety** – we provide our employees with safe and healthy working conditions and practices. For more information, see our Health and Safety Policy.
- 5.1.6. **Data Privacy** – we treat all employee personal information sensitively, in confidence and in line with legal obligations, and we take care to prevent unauthorised disclosure. For more information, see our Data Protection Policy.

### 5.2. **Suppliers and Clients**

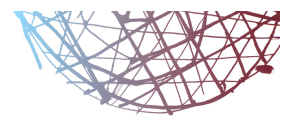
- 5.2.1. **Engagement** – we operate fairly and in accordance with relevant laws and regulations. Suppliers are selected impartially, on the basis of price, quality, and suitability.
- 5.2.2. **Due Diligence** – we evaluate suppliers and partners carefully before engagement and expect them to meet minimum standards across all aspects of business, including ethics, sustainability, and compliance.
- 5.2.3. **Communication** – we are committed to open communication whilst respecting commercial confidentiality. We ensure communication is timely, accurate and understandable, and align communication methods to meet client and supplier needs.
- 5.2.4. **Payment** – we provide regular payments to our supply chain and aim to adhere to payment terms as far as possible.

### 5.3. **Business Ethics and Governance**

- 5.3.1. **Anti-Bribery** – we have a zero-tolerance approach to any gifts, hospitality, payments, kickbacks or inducements which are, or could be construed as, a bribe. For more information, see our Anti-Bribery and Corruption Policy.
- 5.3.2. **Conflicts of Interest** – you must avoid any activity or situation that conflicts, or could be seen to conflict, with your ability to act in the best interests of the Company. Any potential conflicts must be immediately disclosed to the Group Chief Executive.
- 5.3.3. **Information** – we endeavour to ensure that all facts, information and representations communicated externally, to clients, suppliers, the press or others, are accurate.

### 5.4. **Environment**

- 5.4.1. We are aware of the environmental impact of our business and that of the buildings we develop. We recognise and accept our responsibility to minimise this, and we comply with all relevant laws and codes. For more information, see our Environmental Policy.



## 5.5. **Community**

5.5.1. We recognise and understand the impacts we have on the communities in which we operate. We are committed to making a positive social contribution within those communities and acknowledge our responsibility to engage with them.

5.5.2. We are particularly committed to assisting young people, by supporting charities and other organisations, through financial and in-kind contributions including volunteering, mentoring and fundraising.

5.5.3. We have established an independent charity, The Abstract Foundation, in order to further these commitments on a long-term basis. We provide funding, and other in-kind support to the Foundation which makes one-off and multi-year grants to organisations and individuals in areas surrounding our developments, and around the UK. Grants provided by the Foundation normally support one or more of the following aims:

- a. Improving young people's access to career development and training opportunities, including apprenticeships, which will help them to improve their life chances, find employment or start a business;
- b. Improving young people's physical, mental or emotional wellbeing;
- c. Improving young people's skills, capacities and capabilities to enable them to participate in society as independent, mature and responsible individuals; and
- d. Supporting young people who are experiencing or are at risk of homelessness.

N.B. The Abstract Foundation is an independent and legally separate organisation; it has its own Board of Trustees who make their own decisions in the best interests of the charity.

## 6. **BREACHES AND REPORTING**

6.1. **Reporting** – employees must notify the Group Chief Executive as soon as possible if they believe, or suspect, that a breach of this policy has occurred or may in the future. Non-employees must notify their normal point of contact at the Company. If a concern relates to the Group Chief Executive, another Director must be notified.

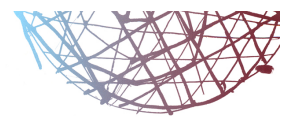
6.2. **Consequences** – any alleged breach will be investigated and could result in disciplinary action up to and including dismissal. The Company may terminate its contractual relationship with contractors, partners, or associates if they breach the principles of this policy.

6.3. **Protection** – we are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in unethical behaviour, or reporting in good faith their suspicion of an actual or potential breach of this policy. We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.

## 7. **TRAINING AND COMMUNICATION**

7.1. Communication of this policy forms part of the induction process for all employees, and periodic training will be provided as necessary.

7.2. Our ethical principles and expectations, including this policy, are communicated, where applicable, at the outset of our business relationship with clients, suppliers, contractors and business partners, and reinforced as appropriate thereafter.



## 8. RESPONSIBILITIES

8.1. **The Board of Directors** is responsible for:

8.1.1. Ensuring this policy complies with the Company's legal and ethical obligations.

8.2. **The Group Chief Executive** is responsible for:

8.2.1. Primary and day-to-day implementation of this policy;

8.2.2. Ensuring this policy is communicated to, understood and observed by employees; and

8.2.3. Ensuring that third parties who carry out activities on behalf of the Company understand the requirements of this policy.

8.3. **All those listed in clause 2.1.** are responsible for:

8.3.1. Reading, understanding and complying with this policy;

8.3.2. Reporting any and all ethical concerns, as outlined in clause 6.1.; and

8.3.3. Avoiding any activity that might lead to, or suggest, a breach of this policy.

## 9. MONITORING AND REVIEW

9.1. The Company will monitor and update this policy as necessary to ensure its suitability, adequacy and effectiveness, and it will be reviewed by the Board of Directors every three years.

## 10. CONTRACTUAL STATUS

10.1. This policy does not form part of any employee's contract of employment and we may amend it at any time.