

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This Modern Slavery Statement relates to actions and activities during the financial year ended 31st December, 2023

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out Dar Global’s commitment to preventing slavery and human trafficking in our own business and our supply chains. As we begin our journey, our members of staff are already aware, through our Code of Conduct, of our zero-tolerance stance against any form of modern slavery, including forced child labour; we also have Whistleblowing channels available which they may use to report any concerns to Dar Global’s management.

Overview of our Organisational Structure

Dar Global Plc is an international property developer operating in Europe (United Kingdom and Spain), the Americas (the United States) and the Middle East and Asia (the UAE, Oman, Qatar, Saudi Arabia, China, Bosnia and the Maldives). Each region has its own management structure, supported by, and reporting into the Group Head Office located in Dubai, UAE.

Supply Chain

Dar Global’s supply chain is comprised of hundreds of third party suppliers, contractors and subcontractors on whom we rely to execute our development projects through the supply of goods and services.

Procurement of these third party goods and services is dealt with by each of the regional divisions. Due diligence as to the third parties’ compliance with Dar Global’s policies and procedures is managed by a central team based at Head Office, and is a continuous process.

High Risk Areas

Some of Dar Global’s suppliers, contractors and subcontractors are smaller businesses, others are located in jurisdictions that do not have stringent requirements to curtail Modern Day Slavery. Dar Global recognises that these entities, along with their suppliers and subcontractors, present the most risk to its business in relation to the Act, and aims to tailor its responses to local circumstances.

Dar Global's Policies

We recognise our moral and ethical responsibilities to do all we can to ensure that our business and supply chains are slavery free. In order to help achieve this we have a number of internal policies approved in 2023 that will help support any future development of policies to protect Human rights. The internal policies include those that govern and control Whistleblowing, Anti-Corruption and Bribery, and our Code of Conduct that covers our approach to Harassment and Bullying, Diversity and Modern Slavery.

Actions taken to Combat Modern Slavery

Contract terms

Dar Global's standard contractor and supplier terms include an obligation on contractors and suppliers to obtain similar commitments from their subcontractors and suppliers.

We have provisions in our contracts for our projects in the Middle East and Asia region that obligates contractors to comply with local labour laws including laws relating to the employees employment, health, safety and welfare, immigration and emigration and ensure all their legal rights are respected. Further, contractors are obligated to pay their employees at least the national minimum wages, or no lower than those established as per the trade or industry standard (as appropriate).

We have set minimum welfare standards for our contractors to provide on site for the staff and labour.

Training and awareness

Dar Global has planned for training for all of its staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place. Refresher training will take place at regular intervals when deemed necessary.

Performance Indicators

We will test the effectiveness of the steps being taken to ensure that our business and supply chains are slavery free, against:

- The number of reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified; or
- The number of reports received from the business' supply chain to indicate that modern slavery practices have been identified.

To date, no reports have been received, but this may change as the company raises further awareness of the Modern Slavery Act.

Further steps to be undertaken

If considered necessary, the company may ask certain suppliers to produce an annual slavery and human trafficking report, setting out the steps they have taken to ensure slavery and human trafficking is not taking place in any part of their business or supply chain.

This statement was approved by the Board of Dar Global Plc on 13th June, 2024.

A handwritten signature in black ink, appearing to be 'David Hunter', with a stylized, flowing script.

David Hunter
Chairman

Date: 14 June 2024