



Anti-Slavery and Human Trafficking

For Financial Year Ending 31 December 2025

Stoneweg Global Platform SCSp, Stoneweg Holding S.C.A. and Stoneweg Management





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1. About this statement

1.0 Introduction

The Modern Slavery Act 2015 (the “**MSA**”) requires any commercial organisation in any sector, which supplies goods or services in the United Kingdom, and carries on a business or part of a business in the United Kingdom, and (together with its subsidiaries) meet the annual turnover threshold of £36 million or more (the “**Threshold**”), to publish an annual slavery and human trafficking statement. Historically, this Anti-Slavery and Human Trafficking Statement (“**Statement**”) was published on behalf Stoneweg European Holdings Limited (previously known as Cromwell European Holdings Limited) (“**SEHL**”). On 24 December 2024 (the “**Acquisition Date**”), SEHL was acquired from Cromwell Property Group (“**CPG**”) by Stoneweg Management SA (see definition below).

Due to the Acquisition and pursuant to Section 54 of the MSA, the reporting entity has change and this Statement is now made on behalf of the following entities:

1. **Stoneweg Global Platform SCSp** a *société en commandite spéciale* registered with the Luxembourg trade and companies register under number B286202 and with registered address at 11, Rue Eugène Ruppert, Luxembourg, L-2453, Luxembourg;
2. **Stoneweg Holding S.C.A.** a *société en commandite par actions* registered with the Luxembourg trade and companies register under number B286519 and with registered address at 11, Rue Eugène Ruppert, Luxembourg, L-2453, Luxembourg; and
3. **Stoneweg Management**, a *société anonyme* registered with the Luxembourg trade and companies register under number B286520 and with registered address at 11, Rue Eugène Ruppert, Luxembourg, L-2453, Luxembourg,

(1, 2, and 3 together the “**Reporting Entities**”).

Stoneweg Management SA, together with its indirect and direct subsidiaries, shall be defined as “**Stoneweg**”, “**we**” and “**us**”.

This is on the basis that the Reporting Entities have reached the Threshold and are the indirect holding companies of the Stoneweg business which capture the activities of the Stoneweg operating companies (including Stoneweg European Holdings Limited) which carry on business in the UK, the US and in Europe in light of the extraterritorial effect of the MSA.



1.1 MSA Suggested Reporting Criteria

Suggested Reporting Criteria	Section
Describe the organisational structure , business and supply chains of Reporting Entities	4
Describe the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	4
Describe the organisations due diligence processes in relation to slavery and human trafficking in its business and supply chains	5
Describe the training provided by the organisation to raise awareness of possible modern slavery and trafficking in the supply chain	5
Describe the policies of the organisation which deal with anti-slavery and human trafficking	6
Describe its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	7 and 8



2. Approval of Statement

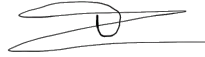
This Statement was approved by the board of directors of Stoneweg GP acting on behalf of **Stoneweg Global Platform SCSp, Stoneweg Holding S.C.A.** and **Stoneweg Management SA** on 25 June 2026 and is signed by:

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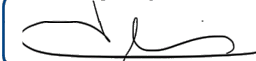
Jean-Pierre Verlainé

Director of Stoneweg GP acting as the general partner of Stoneweg Global Platform SCSp

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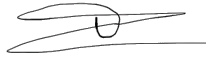
Rui Inácio

Director of Stoneweg GP acting as the general partner of Stoneweg Global Platform SCSp

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Jean-Pierre Verlainé

Director of Stoneweg GP acting as the general partner of Stoneweg Holding S.C.A.

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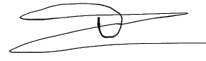
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Director of Stoneweg Management

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Rui Inácio

Director of Stoneweg Management



3. Our Approach

3.0 Approach to Statement

The Reporting Entities acknowledge the role and responsibility they have in generating awareness and implementing steps to uphold human rights and minimise the risk of modern slavery practises occurring in their operations and supply chains.

This Statement describes Stoneweg’s approach to identifying and managing the risk of modern slavery in its supply chains and operations. The year end date for SEHL (previous reporting entity), was amended in 2025 from 30 June 2025 to 31 December 2025. Therefore, this report covers the financial year commencing from 1 July 2024 – 31 December 2025 (“**Reporting Period**”) for the Reporting Entities. All data quoted in this Statement is current as of 31 December 2025, unless stated otherwise.

4. Our Structure, Operations and Supply Chains during the Reporting Period

4.0 Structure and Operations

During the initial part of the Reporting Period, SEHL was a subsidiary of CPG, a global funds manager. CPG is an internally managed Australian Real Estate Investment Trust listed on the Australian Securities Exchange and is a stapled enterprise consisting of Cromwell Corporation Limited ACN 001 056 980 and Cromwell Diversified Property Trust ARSN 102 982 598, the responsible entity of which is Cromwell Property Securities Limited ACN 079 147 809.

Following the Acquisition Date and for the remaining part of the Reporting Period, the relevant entities are the Reporting Entities.

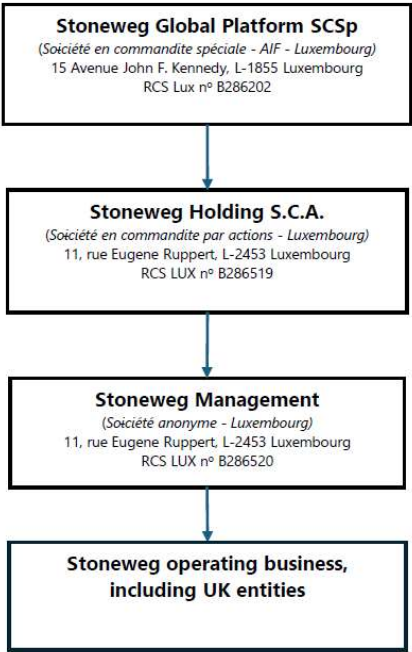


Table 1: Simplified structure chart of the Reporting Entities



Stoneweg is a global alternative investment group headquartered in Geneva, Switzerland, and is part of SWI Group. Founded in 2015 by a team of seasoned investment professionals, Stoneweg has since grown its real assets and alternative investment platform and capabilities both organically and through strategic acquisitions. It currently has ca. €10.0bn of assets under management¹.

Below are some key statistics regarding Stoneweg:

Key Statistics



320+ Investments



c. € 10.0b¹ AUM



16 Countries



Entrepreneurial and deal oriented with
"Boots on the Ground"

Sectors & Services

Logistics & Industrial

Data Centers

Living

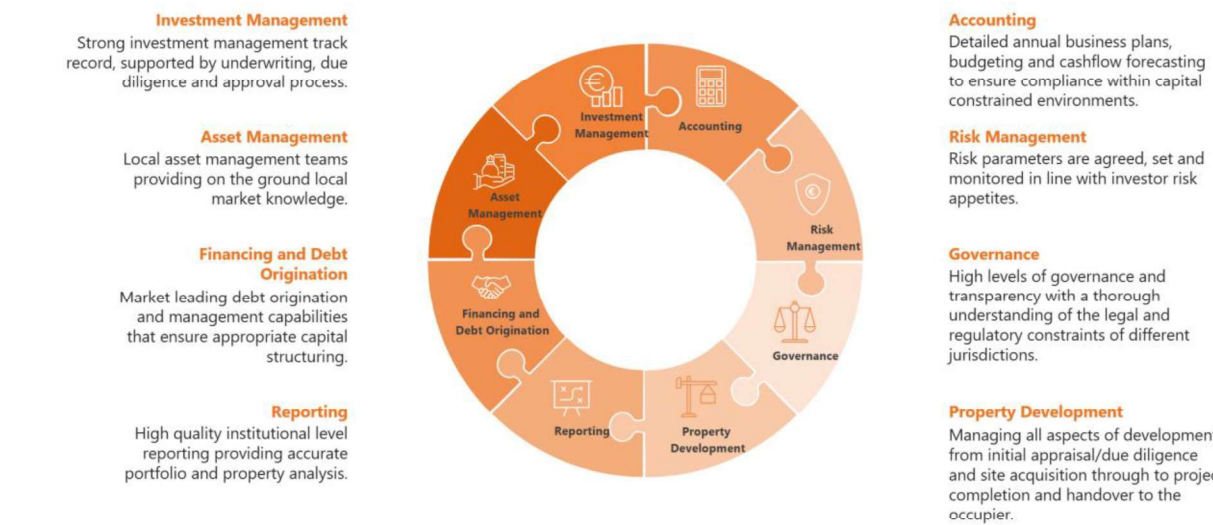
Hospitality

Offices

Debt

- Transaction Management
- Asset Management
- Fund and Investment Management
- Development and Project Management
- All Platform Services (Leasing, Debt, Strategy & Product, ESG and Accounting)

As a global real estate investment group, our operations encompass the acquisition, management, administration, leasing, development and disposal of property assets with our operations undertaken by an in-house team of legal, asset, project, finance, development and property professionals. [Stoneweg is currently at the inception stage of launching a new Alternatives business line which will focus on debt strategies and investing in alternative asset classes other than real estate. Therefore, this part of the business has not been addressed in this Statement given the Reporting Period].



¹ The €10bn AUM relates to the Real Estate arm of the Stoneweg platform.



4.1 Supply Chain

Our supply chain is twofold – we have suppliers which provide services to the corporate side of our operations and suppliers which we engage on behalf of our client mandates. For the avoidance of doubt, references to “supply chain” in this statement are references to our direct suppliers and not references to the suppliers of our suppliers and so on.

4.1.1 Corporate Operations

We appoint a variety of corporate suppliers. These suppliers can range from professional advisers such as accountants, lawyers and auditors to SaaS/IT supplier with the majority of these suppliers based in Europe or the US or being part of a global organisation.

Exposure to high-risk industries in our corporate supply chain is limited (e.g. to the procurement of goods and services associated with maintaining our own corporate business) and includes the provisions of cleaning services within our offices and the use of IT equipment and stationery.

Overall, we have assessed the risk of modern slavery occurring in our corporate supply chain as low given (i) the jurisdictions in which we operate and (ii) that many of the counterparties with whom we contract with are regulated professional advisers (such as lawyers and accountants).

4.1.2 Client Mandates

We manage property on behalf of our clients and investors. Funds management, strategic management and professional services are principally provided by affiliates of the Reporting Entities and externally appointed professional service consultants. However, where we are responsible for arranging activities such as technical property management and facilities management these activities are typically outsourced by us to third-party suppliers.

We recognise that there are risks of modern slavery in those business activities which are typically outsourced to third-party suppliers, as this reduces our visibility over the appointment and recruitment practices of such third-party suppliers.

We have determined our greatest exposure to modern slavery practises rests within this division of our business as activities such as facilities management may be carried out by individuals in potentially low skilled labour sectors.

Associated risks may also occur through the goods and raw materials procured by them or supplied by them, in the construction, maintenance, care and operation of these properties.

In addition, following the Acquisition Date, Stoneweg manages properties operating in the European Union across a diverse range of sectors from hospitality (e.g. hotels, restaurants) to leisure activities (e.g. museums and exhibitions). Certain entities within these structures, may employ workers in roles that are typically considered lower-skilled, and/or seasonal workers. Operations in these sectors are subject to robust labour, employment, and health and safety regulations, which are aligned with European Union standards. Employment relationships are



formalised through written contracts and entities are required to comply with applicable minimum wage, working time, social security, and collective bargaining requirements. Based on the geographic location and regulatory environment, the risk of modern slavery and human trafficking in these sectors is considered low.

As the business continues to grow and expand its development and project management activities, we will continue to monitor for potential modern slavery risks which may occur in these supply chains and will consider the necessity for more robust checks (if required).

5. Our Actions to Identify, Assess and Manage our Modern Slavery Risks

5.0 Risk Identification

5.0.1 Corporate Operations

Our corporate operations are considered low risk due to the countries in which we operate and the fact that no instances of modern slavery have been identified. Notwithstanding this, we acknowledge the following risks may exist with regards to the recruitment and management of staff in our corporate operations:

- Inadequate due diligence in appointment of recruitment agencies, increasing risk of deceptive recruitment practices.
- Inadequate modern slavery training, reducing the effectiveness of policies, procedures and controls to manage risk of exploitation.
- Inadequate grievance mechanisms, reducing identification of breaches to enable remediation.

5.0.2 Client Mandates

As noted in 4.1 above, we have determined that the risk of modern slavery occurring in our corporate supply chain as low and that our greatest potential exposure to modern slavery risks lie within the client side of the business and the outsourcing of technical property management and facilities management services as well as the supply of services in relation to development and project management activities. However, overall, we view modern slavery risk in our supply chain as low.

5.1 Risk Management - Internal Controls

To address the general operational risks including recruitment practices identified above at section 5.0.1 a number of controls and due diligence activities are in place as a matter of best practice.

5.1.1 Corporate Recruitment

Below are the steps taken by our internal HR team when recruiting and onboarding staff to alleviate any potential modern slavery risks:

Recruitment Services

- Exclusive partnerships with well-established recruiters are in place.



- Seeking to include a clause in contracts with recruitment agencies acknowledging adherence to the Supplier Code of Conduct prior to engaging with any external recruiter (see 5.1.2 below).
- Ensuring all candidates are capable of interpreting the terms and conditions of employment.
- Checks are carried out to ensure personnel are legally entitled to work in the jurisdiction in which they are hired.

Temporary or unskilled labour

- Temporary staff are appointed either directly through Stoneweg or through agencies for short-term assignments and considered for permanent positions if the resourcing need becomes longer term.

Remuneration benchmarking for new joiners

- A remuneration benchmarking exercise is carried out with local recruitment agencies when recruiting for a new position.

5.1.2 Contractual Obligations

Supplier Code of Conduct

We continue to seek to include modern slavery-focused contractual obligations in third party supplier agreements where appropriate. These provisions seek to include an obligation on suppliers to comply with our Supplier Code of Conduct (see 6.1 below).

In addition, we monitor the inclusion of such contractual clauses in material corporate supplier contracts through a contract approval process signed off by senior management. This ensures that appropriate governance relating to the inclusion or absence of adequate contractual obligations is applied.

Standardised Terms & Conditions

We have developed a standardised set of terms and conditions per jurisdiction. These terms and conditions include specific modern slavery-focused contractual obligations and an obligation for vendors to comply with our Supplier Code of Conduct. The aim going forward will be to incorporate them into our procurement process.

5.1.3 Training & Awareness

Refresher mandatory modern slavery awareness training will be provided to the integrated Stoneweg business and will be provided to any new joiners. This training will aim to:

- explain what modern slavery is;
- provide examples of what might constitute modern slavery; and
- explain our obligation as a business to report on modern slavery.



6. Policies which address Anti-Slavery and Human Trafficking issues

6.0 Corporate Ethics and Human Values Policy

The Corporate Ethics and Human Values policy outlines the standards of workplace behaviours required of all Stoneweg employees as well as contractors, and clarifies what constitutes unacceptable behaviour. It encourages employees to report any concerns related to modern slavery which will be investigated and, where appropriate, actioned.

Stoneweg upholds internationally recognised human rights as outlined in the International Bill of Human Rights and the core conventions of the International Labor Organisation. We are committed to complying with all applicable laws and implementing robust controls wherever we operate. Where national laws differ from international human rights standards, we will always follow the higher standard.

Stoneweg opposes modern slavery practices and, consistent with our values, is committed to identifying and managing the risk of modern slavery occurring throughout our business operations and our supply chains. The broader business community and governments alike recognise the importance of eliminating, as much as possible, modern slavery practices that occur in the supply chains and operations of business entities.

Stoneweg has a zero-tolerance approach to modern slavery and is committed to consistently reviewing and strengthening its processes and systems to minimise the risk of modern slavery or human trafficking in its supply chains or any part of its business.

6.1 Supplier Code of Conduct

We recognise the importance of building and maintaining strong partnerships with our suppliers. Core to this relationship is an expectation that suppliers hold a joint commitment to conduct business with integrity, honesty and in compliance with the law.

The Supplier Code of Conduct sets out expectations of suppliers to comply with relevant laws including but not limited to those governing consumer protection, environment, social, anti-competition, human rights, modern slavery and health, safety and welfare.

It further sets out the standards to which we expect suppliers to operate (including obligations with respect to eliminating human trafficking, and practices such as servitude and forced labour). The relevant Supplier Code of Conduct during the Reporting Period can be found here: <https://www.stoneweg.com/esg/>

6.2 Employee Code of Conduct

The Employee Code of Conduct sets forth certain minimum standards of behaviours and business conduct that we expect of all employees and workers. It also encourages employees to speak up and either report any breach anonymously or to contact the HR team if they are concerned that the Employee Code of Conduct may not have been followed.



6.3 Whistleblowing Policy

The Whistleblowing Policy actively encourages and supports the reporting of any actual or suspected malpractice within Stoneweg or by a third party. The related whistleblowing procedure is designed to ensure that any matter raised under this policy will be investigated thoroughly, promptly and confidentially, and that appropriate action will be taken if any wrongdoing is confirmed.

7. How we assess our Modern Slavery response

7.0 Measuring Effectiveness of our Actions – Sustainability Framework

No instances of modern slavery or suspected modern slavery have been reported via our whistleblowing policy or otherwise during the Reporting Period. We remain committed to develop our understanding of the risk of modern slavery occurring in our own operations and supply chains and to mitigate any potential issues or risks we identify, along with meeting our corporate responsibilities as a sustainable asset manager.

8. Ongoing Commitments

We will continue to assess what steps might be appropriate as we develop our understanding of the risk of modern slavery occurring in our own operations and supply chains. During the next financial year, Stoneweg will:

- continue to perform sanction screening on our future suppliers across the platform;
- aim to embed our terms and conditions, containing appropriate modern slavery provisions, into our procurement process;
- continue to promote the topic and encourage awareness and understanding of our employees through training when relevant; and
- continue to seek to implement contractual modern slavery-focused provisions in third-party supplier contracts where appropriate.