



## UK Modern Slavery Act Statement – 2026

### Purpose, Benefits and Scope

This statement is made, approved and published pursuant to section 54 of the *UK Modern Slavery Act 2015* on behalf of Altus Group Limited and its subsidiary companies.

Altus Group Limited and its subsidiaries and affiliates (collectively, “**Altus Group**”) have a zero-tolerance approach to slavery, human trafficking and forced labour, both within our business and in our supply chain. It continues to be a priority for Altus Group to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organization and in our supply chain. Our commitment to acting ethically and honestly in how we do business is underlined in our Code of Ethics and Business Conduct (the “**Code**”).

### Our Business and Supply Chain

We recognize that it is crucial for us as an organization to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

Altus Group connects data, analytics, and expertise to deliver the intelligence necessary to drive optimal CRE performance. The industry’s top leaders rely on our market-leading solutions and expertise to power performance and mitigate risk. Our global team of ~ 1500 experts are making a lasting impact on an industry undergoing unprecedented change – helping shape the cities where we live, work, and build thriving communities. Our parent company, Altus Group Limited, is registered in Canada, and Altus Group has offices in the UK as well across North America, Europe, Middle East, Australia, New Zealand and Asia (a full list can be found: [Offices | Altus Group](#)).

Our supply chain provides us with a variety of business, data and technical solutions. We conduct diligence on suppliers prior to engaging with them. Most of our suppliers are internationally recognized companies. Some of our suppliers operate in areas where there is increased risk for modern slavery. We will continue to consider ways to develop and enhance our risk-based assessments of suppliers in this area, as we mature our supply chain management programs and policies.

### Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain. We have the following policies in place relevant to modern slavery, which we continuously review and update:

- Our [Code of Ethics and Business Conduct](#) reflects our commitment to acting ethically and with integrity in all our business relationships, and all of our employees are legally bound to it. It also requires any of our personnel who become aware of any illegal or unethical behaviour to report it to executive officers or other appropriate personnel.
- This commitment to ethical business practices is also further protected by our [Whistleblower Policy](#).
- Our internal Procurement Policy sets out the requirements for purchasing or procurement activities undertaken on behalf of Altus Group. The objective of the policy is to ensure that Supplier engagement and sourcing activities within Altus Group are initiated, managed, and reported in a consistent way to mitigate key risks across the supply base.

Our internal Procurement Standard outlines and enforces the sourcing approach, compliance expectations, and the roles internal stakeholders have in the sourcing process.

## **Procurement Process and Supply Chain Compliance**

Our suppliers are carefully selected and approved. All of our supplier relationships are reviewed on a regular basis.

Our major suppliers are contractually bound to obey all local laws. Any suggestion that a supplier might be in breach of this commitment by engaging in slavery, human trafficking or other form of forced labour or servitude would result in an investigation and would render the contract liable for termination.

## **Training**

Our employees and independent contractors receive annual training on the Code of Ethics and Business Conduct and are required to acknowledge their understanding and compliance with the Code. Employees are expected to uphold the principles of the Code throughout their employment with the company.

## **Monitoring and Evaluation**

We remain committed to continuously evaluating and enhancing our processes and systems to ensure the effectiveness of our modern slavery compliance efforts. This includes regular reviews of our existing policies and procedures.

We also monitor regulatory developments in jurisdictions in which we operate.

This statement has been reviewed and was approved by the Board of Directors of the Corporation on May 6, 2026.

Signed by: "Terrie-Lynne Devonish"

Position: Chief Legal Officer and Corporate Secretary

On behalf of the Board of Directors of Altus Group Limited