

Regalhill Limited

Anti-Modern Slavery and Human Trafficking Statement

Approved by the Board of Directors: June 2022

Regalhill Limited and its subsidiaries (the "Group"/"we"). *

This statement has been published pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the Group for the financial year ending 31 December 2021. The contents of this publication has been approved by the Group's Board of Directors. To ensure continued effectiveness and adherence to active eradication of any form of modern slavery in its direct operations or in the indirect operations of its supply chain the Group will review this report and its associated matters annually.

Modern slavery is a heinous crime and the Group believe that businesses have a vital role to play in tackling the issue. The Group is dedicated to creating a corporate culture and ethic where business is conducted with honesty and integrity and everyone is treated with dignity and respect. It is for this reason that the Group has zero tolerance to, and is committed to ensuring that it is not complicit in, any forms of slavery, servitude, forced labour and human trafficking ("Modern Slavery"). Similarly, we expect the same commitment from all of our employees, contractors, suppliers, and other business partners.

Organisations Structure

The Group is a leader in real estate and growth capital with a business portfolio that is embedded across the world. We are an independent family business, with a track record of entrepreneurship and value creation, our current projects total in excess of £1.3billion.

There are approximately 66 colleagues in the Group working from five offices in the UK.

There is an ongoing commitment across the business to operate in an environmental and socially responsible manner, this extends to matters concerning Modern Slavery. The environmental and social consequences of how we work, travel and consider our surroundings is always an important consideration. We look to promote awareness across projects all the way through to our day-to-day work environment.

We look to attain high social standards through improved working conditions, health and safety, diversity and tackling inequality. We ensure where possible that our supply chain adheres to labour standards and ethical sourcing. We believe we are a socially responsible business that is built on high levels of corporate integrity and governance including applying best in practice accounting policies, ownership and control procedures, diversity and pay.

Our Supply Chains

We procure a wide range of goods and services through a diverse supply chain, which includes:

- Main Contractors;
- Subcontractors who provide materials, labour and plant;

- Manufacturers and Suppliers who deliver direct to site or to the Subcontractor;
- Utility Companies; and
- Professional & Specialist Consultants.

Several of our suppliers will have turnovers that trigger a requirement to comply with the obligation to produce a Slavery and Human Trafficking Statement under the Act.

We actively encourage all our suppliers notwithstanding the contents of the Act to ensure that they comply with the spirit and intent of the Act. We have a stable supply chain allowing us to benefit from a significant number of long-standing trading relationships with likeminded Subcontractors, Suppliers and Consultants who share our values and ethics.

Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of the adoption of such an Anti-Modern Slavery Policy, the Group has determined and implemented various risk assessment measures to prevent Modern Slavery practices both in its operations and through its supply chain.

Additionally, we have a whistleblowing policy in place to ensure that our employees and contractors can voice any concerns about Modern Slavery without fear of repercussion.

Due Diligence Processes

We review suppliers' Modern Slavery policies, practices, and reputations at the point of initial business relationships. These are then periodically reviewed as part of our supplier approval and audit processes.

Risk assessments

There are parts of the business and supply chains where there may be a risk of slavery and human trafficking, but the Group take the necessary steps to identify, assess and manage these risks.

Effectiveness of measures

Regular reviews of our supply chain ensure of our supply chain and business partner network ensure that the measures and standards implemented by the Group are, and remain, effective.

Training, awareness and monitoring

This statement will be periodically disseminated to employees and will be available on the Group's website and intranet.

The Group's company secretary has been charged with identifying relevant staff to whom specialized training in such matters will be conducted (specifically those involved in the Group's supply chains).

We commit to continually review our business and supply chain to identify any areas which may be at risk of contravening the Modern Slavery Act and take the necessary steps to mitigate any risks identified.

This statement has been approved by the Group's Board of Directors and is signed by a Director on its behalf.

Ken Bate, Regalhill Limited

Note* - *None of the subsidiary entities exceed the £36m turnover threshold for reporting. It is only the Group in consolidation that meets the reporting requirement.*
