

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Regal Holdco Ltd is a privately owned value added real estate company delivering residential led mixed-use schemes in London. As a leader in our chosen markets, our objective is to deliver excellent services for our customers, resulting in safe, fair and professional contracting service at all times.

We recognise that the execution of our services involves labour being procured throughout our business and supply chains and understand that this entails the risk that modern slavery may take place.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in either our own business, or in any of the businesses of our supply chains.

This policy applies to all persons working for us or on our behalf in any capacity, wherever they are located in the world, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.

Integrity

We are committed to ensuring that there is transparency in our business and in our approach to tackling modern slavery that is consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners and will include, as part of our contracting processes within our supply chain (including contractors, suppliers and other business partners), specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Intelligence

We will take an intelligent approach to ensuring that our business and supply chains have effective systems and controls in place to ensure that slavery does not take place.

Teamwork

Our employees and supply chain will work together in alignment with our internal processes to ensure compliance with the Modern Slavery Act 2015.

Performance

We are committed to implementing systems and processes to ensure that there is zero-tolerance towards any acts of modern slavery within our business and throughout our supply chains.

Compliance with the policy

We believe that modern slavery violates fundamental human rights and we are committed to play our part in ensuring that this does not take place within our community.

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those

working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Operations Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred, or that it may occur, you must notify the Operations Director as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Operations Director.

We encourage openness and will provide support to anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be, taking place in any part of our own business or in the businesses of any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform [HR] immediately. [If the matter is not remedied, and you are an employee, you should raise it formally by following our Grievance Procedure].

Responsibility

Senior Management has published this policy and is responsible for reviewing and updating it. It will review this policy annually and at such other times as may be required, to ensure it remains relevant and appropriate to the aims and objectives of our business.

Communication and awareness of this policy

Our zero-tolerance approach to modern slavery must be communicated to all members of our supply chain and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter

Our employees are collectively and personally responsible for the communication, understanding and practical application of this policy. This policy and training on this policy and the risks our business faces from modern slavery in its supply chains will be made available to all new employees at recruitment stage and to our supply chain and to any other interested parties upon request. Revisions to the policy and/or specific risks will be communicated to those affected by the changes.

Breach of this policy

Breaches of this policy will be dealt with under our disciplinary procedures and possible police involvement and could lead to dismissal in appropriate circumstances.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



Damien Cartmell

DIRECTOR

REGAL HOLDCO LTD