

ANTI BRIBERY AND CORRUPTION STATEMENT

Financial Year Ended 31st March 2023 – Reported April 2023

This statement is supplemental to Regal London's Anti Bribery and Corruption Policy ("the policy"). The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with the Regal London group of companies, within all regions, areas and functions.

This statement is Regal London's annual review of its Anti Bribery and Corruption Policy and compliance for the period 1 April 2022 to 31 March 2023. The statement will be reviewed and issued by the Board annually.

Our business

Regal Holdco Ltd and its group companies (Regal London) 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 maintain the highest level of professional and ethical standards in the conduct of our business affairs. The actions and conduct of the company's staff as well as others acting on the company's behalf are key to maintaining these standards and each individual has a personal obligation to ensure that the policy is adhered to.

Regal London is committed to taking a zero-tolerance approach towards bribery and corruption and is committed to upholding all laws relevant to combatting bribery and corruption in the jurisdictions in which it operates. This policy applies to everyone in the company in any of the company's offices worldwide (including those operating within branch and/or subsidiary companies). If there is any inconsistency or conflict between the policy and local custom in any jurisdiction the policy will prevail except for where the local custom is required by the written law of that jurisdiction, in which case the local law will apply.

Potential risk areas

We are committed to being pro-active in taking measures to address any risk and to mitigate against any issues arising. In the policy we have identified the following potential risks:

1. *High risk jurisdictions:*
providing services to individuals/organisations and/or entering into relationships with third parties based in high risk jurisdictions.
2. *Excessive gifts, entertainment and hospitality:*
the giving or receiving of gifts, hospitality, donations or sponsorship.
3. *Facilitation payments:*
are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right.
4. *Reciprocal agreements:*
or any other form of '*quid pro quo*' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by management.

5. *Actions by third parties for which the company may be held responsible:*
can refer to a range of people including but not limited to counterparties, agents, contractors, consultants joint venture partners, advisors, business contacts, government and public bodies.
6. *Record keeping:*
can be exploited to conceal bribes or corrupt practices.

Policies and procedures

In order to mitigate against the risk of bribery and corruption within the risk areas identified above, Regal London had adapted and implemented the policy and the good practices set out therein including but not limited to:

General

1. Bribery Act compliance will be raised at board meetings to review the Gifts and Hospitality Register and monitor compliance. The Board will meet quarterly to identify changes in regulation, define strategies to improve governance with regards to regulation, agree actions and monitor progress and issue this statement.
2. We have an anti-bribery procedure which requires employees to make a report of any occurring bribery incidents.
3. We have a procedure which requires employees to log all gifts/hospitality given/received and to seek approval for giving/receiving all gifts/hospitality in excess of defined thresholds.

Suppliers and subcontractors

4. We perform due diligence checks to confirm the reputability and credibility of the third party
5. We assess the bribery and corruption risk of the third party, considering the jurisdiction and sector. Where it is determined that there is a high risk element involved consider asking for a copy of the third party's anti-bribery and corruption policy or obtaining similar assurances as necessary.
6. We incorporate anti-bribery and corruption wording into all contractual documentation.
7. We advise third parties of the company's expectations regarding bribery and corruption; namely that the company prohibits anyone working on its behalf from offering or giving anything of value (including facilitation payments and gifts) to any person to gain a business advantage or to induce that person to carry out their business or duties improperly.

Employees

8. We provide Anti Bribery and Corruption training for senior management and all employees and require all staff to complete such training annually.
9. We issue a reminder to the business on a monthly basis to consider compliance and forward any information in regard to gifts given or received by us or any third party, and keep an up to date log of approvals for gifts/hospitality.

The Board is satisfied that the policy and practices adopted by the company remain relevant, adequate and effective.

Approval of this statement

This statement was approved by the Board of Directors on 3 April 2023 and signed on its behalf by:

Jonathan Seal
CEO
03/04/23