

MODERN SLAVERY ACT STATEMENT – JANUARY 2021

This is the modern slavery and human trafficking statement of Rightacres Property Co. Limited and all its subsidiaries and UK Group companies (including Rightacres Property Group Limited, Central Quay One Limited and Destiny Living Limited). This statement is made pursuant to section 54 of the Modern Slavery Act 2015 ("The Act") and has been adopted by all subsidiaries and group companies listed above as their respective slavery and human trafficking statement for the current financial year, ending 30 September 2021.

The principal activities of Rightacres Property Co. Limited include property development, property investment and property trading.

Our supply chain comes from many different areas. However, in our dealings with our suppliers, contractors and consultants, we strive to ensure that the highest ethical standards are always achieved.

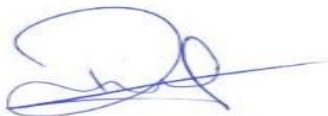
We are committed to ensuring, as far as is practically possible, that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our supply chains or business. To ensure this, we regularly request confirmation of compliance with the Act from our main contractors and their sub-contractors and expect them to comply fully with the legislative requirements. Where possible, we build strong relationships with local suppliers and contractors and make clear our expectations of business behaviour (and the importance of compliance with the Act). We do not directly employ the people who work on our development sites, but we take very seriously the adherence to the provisions of the Act by our contractors, their sub-contractors and our consultants. All our contractors have procedures in place to vet employees and to ensure compliance with the terms of the Act and such procedures are reviewed and improved yearly.

We are a small employer (with fewer than 12 employees) and we have policies in place regarding employee conduct and welfare. These policies are reviewed and amended regularly to comply with our stance on forced labour, slavery and human trafficking.

In terms of employee recruitment, we have procedures in place to ensure that all employees are entitled to work in the UK at their own free-will and that they understand that they can cease their employment at any time in accordance with the terms of their employment contracts. Employees are compensated with salary and benefits packages that meet or exceed the statutory minimum legal requirements. We also comply with the Working Time Directive, unless employees voluntarily chose to opt-out (within the limitation imposed by the Working Time Directive). Training is provided to relevant members of staff when required to ensure a high level of understanding of the risks of modern slavery and human trafficking. We expect all employees to report concerns and the Board of Directors is expected to act on them; the protection of whistle-blowers is guaranteed.

Most of our suppliers and contractors are based in the UK and, therefore, pose minimum risk in terms of non-compliance with the Act. Although we see our business as low risk in relation to the threat of slavery and human trafficking offences being committed, we are committed to carrying out compliance audits on a regular basis. We have zero tolerance to slavery and human trafficking and expect all those in our supply chains, contractors and consultants to comply with our aims, values and standards. We are committed to continue to review, evolve and improve our policies over time to ensure continued compliance with the terms of the Act.

This statement has been considered, approved and adopted by the Board of Directors of all the group companies and subsidiaries listed above for the current financial year, ending 30 September 2021.



Paul McCarthy

Chief Executive
27 January 2021