

## **MODERN SLAVERY ACT STATEMENT**

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GMG Real Estate Limited trading as RE Capital (**RE Capital**) remains committed to acting ethically and with integrity in all business dealings. It is further and specifically committed to improving its supplier/vendor management and procurement practices to combat slavery, child labour and human trafficking and to meeting the requirements of the Modern Slavery Act 2015.

### **RE CAPITAL STRUCTURE**

RE Capital is a real estate management and professional services provider with offices in London, Lisbon and Geneva. It has subsidiary companies in Luxembourg, Switzerland, Portugal and the United Kingdom.

This policy applies to all RE Capital group companies and to persons working for us or on our behalf in any capacity, including business partners, consultants, employees and contractors.

### **RE CAPITAL RISK ASSESSMENT**

The RE Capital supply chains include but are not limited to the following:

1. Technology (software and hardware)
2. Travel
3. Professional advisors including lawyers, accountants
4. Real estate agents
5. Insurance
6. Construction work

We identify the greatest risk within the supply chains that lie downstream of our immediate suppliers and also in supply chains, particularly those in the construction sector.

As such we shall continue to implement relevant contractual clauses required to reduce or remove the identified risk and to ensure that suppliers undertake to comply with laws and regulations

### **RE CAPITAL DUE DILIGENCE**

RE Capital is committed to ensuring that, as far as practicable, there is no modern slavery, child labour or human trafficking in our supply chains or in any part of our business. New suppliers will be reviewed and subjected to appropriate due diligence to identify and mitigate risk and where appropriate contractual clauses will be included in agreements. Existing service providers will be reviewed regularly to assess their ability to meet their legislative and regulatory obligations.

**SUPPLIER ADHERENCE TO THE RE CAPITAL VALUES AND ETHICS**

RE Capital has a zero tolerance to slavery and human trafficking. To ensure that both all vendors in our supply chain and also contractors recommended by us to clients comply with our requirements and the relevant legislation we will assess risk prior to signature of a contract or Transaction Recommendation Form.

We may terminate or recommend the termination of a relationship with individuals and organisations if they breach this policy.

**WHISTLEBLOWING**

Processes are in place to protect whistleblowers and provide training for employees on the risks of modern slavery, child labour and human trafficking. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Concerns are to be addressed to Rogerio de Carvalho in the first instance either by e-mail ([rogerio@recapital.com](mailto:rogerio@recapital.com)) or telephone (020 3318 1803).

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking policy for the year ended 31 March 2021. This statement has been approved by the board.

Newman Leech  
CEO