

Slavery and human trafficking statement

This statement has been prepared and published in accordance with the Modern Slavery Act 2015 and relates to the Company's financial year ended 31 August 2020.

Slavery and human trafficking statement for RDI REIT P.L.C.⁽¹⁾

**Modern Slavery Act 2015 (the "Act")
("RDI" the "Company" or the "Group")
For the year ended 31 August 2020**

Introduction

In accordance with section 54 of the Act, every organisation which supplies goods or services and carries on a business in the UK, with a total annual turnover of £36 million or more, is required to produce a slavery and trafficking statement each financial year advising of the steps taken to prevent modern slavery in its own business and supply chain.

This statement has been prepared and published in accordance with the Act relating to the Company's financial year ending 31 August 2020. The statement sets out the steps that RDI has taken and is proposing to take in order to address the risk of slavery and human trafficking that may be taking place in our business or within our supply chain.

Our Structure

RDI is a UK Real Estate Investment Trust listed on the London and Johannesburg Stock Exchanges. At 31 August 2020, RDI owned a £1.2 billion property portfolio, of which £11.6 million was held in joint venture. Our annual turnover to 31 August 2020 was £69.0 million, arising primarily from the leasing of commercial, retail and hotel properties in the UK and Germany.

The Company employed 58 people and bought, sold and redeveloped properties, which were let to tenants.

Our Supply Chains

The Group's operations were located in the UK and Germany.

Its supply chain included contractors, subcontractors, suppliers of goods and services, and professional service providers. As these suppliers were engaged in UK and Germany, where there are few human rights' issues, risk exposure to modern slavery within the Group was considered to be low.

Modern Slavery 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. The Group has in place a number of policies which support our commitment to acting ethically and with integrity throughout the business, some of which are listed below:

- Code of Ethics and Conduct for Suppliers
- Equal Opportunities Policy
- Health and Safety Policy
- Anti-bribery Policy
- Whistleblowing Policy
- Sustainability and Social Responsibility Policy
- Anti-facilitation of tax evasion Policy

(1) RDI REIT P.L.C. registered a change in name to Brightbay Real Estate Partners Limited on 20 December 2021. The MSA statement will be updated to reflect the Company's new name once this is registered on the MSA Registry.

Slavery and human trafficking statement continued

Due Diligence Processes

The Group takes the following steps to minimise the risks of modern slavery:

- Subsidiary companies and joint venture arrangements – due diligence is performed on all directors of subsidiaries and on shareholders and joint venture partners
- Assets – all necessary due diligence is performed when acquiring assets
- Tenants – new leases specifically require that tenants adhere to the Act
- Employees – are required to adhere to a Code of Ethics and the Employee Handbook. As part of the formal induction process, all new employees are made aware of the Company's Modern Slavery statement and how to raise concerns through the Group's Whistleblowing Policy and independent Whistleblowing hotline, details of which are included in the Employees handbook, and on the Company's website
- Suppliers – all current and new suppliers are required to confirm on an annual basis that they have adhered to the Suppliers' Code of Ethics. RDI expects suppliers, inter alia, to (i) not employ child labour; (ii) pay at least the living wage; (iii) ensure working hours are not excessive; (iv) respect the right to collective bargaining; and (v) ensure no harsh or inhumane treatment is tolerated

Risk Management

The Group's process for identifying and managing risk, including modern slavery, is set by the Board and delegated to the Audit and Risk Committee. The risk management plan was reviewed during the year with the design, implementation and monitoring being the responsibility of management on a day to day basis.

A leading accounting firm conducted an internal audit on the Company's regulatory compliance in 2017, including its due diligence processes in relation to slavery and trafficking in its business and supply chain. All suggested improvements were addressed.

A Sustainability and Social Responsibility ("SSR") Committee was appointed in 2014 and a SSR policy adopted to ensure that the highest standards of ethical behaviour are maintained.

Ongoing Effectiveness

The Group will continue to monitor the effectiveness of the steps it has taken to stop slavery or human trafficking taking place in the business and supply chains, including monitoring the need for further actions as we continue our risk assessment and due diligence activities, and receive responses from key suppliers.

In conducting business, the Group adheres to a Code of Ethics which promotes honesty and integrity in all business dealings and conduct befitting the reputation of the Company. Any instances of unethical behaviour or an abuse of human rights, including modern slavery, can be reported by employees (the term includes suppliers) using the Whistleblowing Policy, Whistleblowing hotline or to a line manager. No human rights' concerns or whistleblowing reports were received during the financial year ended 31 August 2020.

This Statement was approved by the Board on 18 February 2021.

Stephen Oakenfull, CEO

RDI REIT P.L.C.