

Modern Slavery Statement March 2021

Background

This statement is made pursuant to s.5 (1) of the Modern Slavery Act 2015 and sets out the steps that Real has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Real has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Real is a construction, development and management group operating throughout England. We are a multi-talented organisation, working across a wide range of market sectors within the built environment. We bring together an immense wealth of experience, expertise and talent, united by common values and principles, focused on partnering with our clients to enhance the quality of living for the communities in which we work.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for Real, as it did for other companies across the nation.

Real welcomed the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, Real remains in a position to publish its statement for the financial year 2019/2020 in line with the original publishing requirements.

Real concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic.

The company's use of suppliers dropped significantly due to the fact that homeworking was swiftly implemented in March 2020 which meant that some of its premises, from which it usually conducts day to day business, were temporarily closed. Several of our workforce were placed on furlough as a result of the drop in demand for our services, meaning there were no additional temporary labour needs.

During the pandemic, employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid at least Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking. During the pandemic, Real took the decision to ensure that all of the workforce who were required to self-isolate in accordance with public health guidelines continued to receive full pay during their absence.

Real's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Definitions

Real considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

Real acknowledges its responsibilities in relation to tackling

modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015.

Real understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Real does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Real strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Bribery Policy
- Environmental Policy
- Health & Safety Policy
- Modern Slavery Policy.

Our high risk areas

Real considers its main exposure to the risk of slavery and human trafficking to exist within our sub-contractors workforce. As with other businesses working in the built environment, the majority of the workforce employed on our construction sites and the materials supply chain are sub-contracted labour and therefore we work closely with them to enable them to understand their legal obligations.

Our sub-contractors

Real operates an approved subcontractor list. We conduct due diligence through pre-qualification questionnaires/ interview prior to allowing them to become approved subcontractors. Part of this approval includes sub-contractors confirming that no part of their business operations contradicts our Modern Slavery Act Policy.

Due diligence

Real carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Real has not, to its knowledge, conducted any business with another organisation which has been found to have

involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the organisation has taken the following steps to ensure that modern slavery is not taking place:

- employee induction making our employees aware of the Modern Slavery Act, including the definitions of slavery and human trafficking;
- advising staff what to do if they suspect a case of slavery or human trafficking;

Slavery compliance officer

Real has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to Real's obligations. This officer is [Lisa Fitzsimons](#).

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year

Governance

Real will commit to fulfilling its legal obligations as set out by all current legislation relating to employment disputes. This will include, but will not be limited to, the following:

- The Equality Act (2010)
- The Human Rights Act 1998
- General Data Protection Regulations (2016).

Company policies are communicated and made available via the Real Intranet and are referenced in a number of internal training programmes.

Company policy is approved by the Chief Executive Officer. Each policy is reviewed at least annually to ensure that we respond to clients, business strategy, legislation and any standards or codes of practice determined by the market.

This policy must be strictly adhered to by every employee. Any breaches of this policy will be investigated and, where appropriate, disciplinary procedures will be applied. Oversight of the Modern Slavery Policy is the responsibility of the Chief Executive Officer.

Signed on behalf of Real

Signature(s) removed for security reasons:
Signed copies available on request
Paul Nicholls
Chief Executive Officer

Dated: March 2021
Rev:01