

REAL ESTATE CREDIT INVESTMENTS LIMITED (“RECI”)

Modern Slavery and Human Trafficking Statement (the “Statement”)

Modern slavery is an unacceptable condition in our current time but one which is sadly still prevalent in the societies in which we live and operate. The UK Modern Slavery Act 2015 (“the Act”) requires relevant commercial organisations operating in the UK to report annually on the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place both in its own business but also in any of its supply chains.

Real Estate Credit Investments Limited (“RECI”) is a Guernsey authorised closed-ended investment company listed on the London Stock Exchange. It is managed by Cheyne Capital Management (UK) LLP (“Cheyne” or “the Investment Manager”), a regulated investment manager in the UK, authorised by the Financial Conduct Authority.

The Investment Manager is a leading alternative investment fund manager investing across the capital structure, focusing primarily on corporate and real estate assets. The Cheyne Real Estate Group is one of Europe’s leading providers of real estate finance, offering innovative lending solutions across the capital structure. Cheyne has a 15-year track record in real estate investing and currently manage USD 5.5 billion of investor capital. A team of 50 dedicated professionals have extensive combined experience in European real estate investing across the capital structure and across a number of strategies, including senior debt, mezzanine debt, structured real estate credit, complex special situations and direct real estate management (including development and real estate operating platforms).

Supply Chain

RECI’s objective is to provide shareholders with attractive and stable returns, primarily in the form of quarterly dividends by exposure to a diversified portfolio of real estate credit investments, predominantly comprising real estate loans and bonds. RECI invests in real estate debt secured by commercial or residential properties in the United Kingdom and Western European countries focusing primarily on those countries where it sees the changing dynamics in the real estate debt market offering a sustainable deal flow for the foreseeable future.

As an investment company, RECI does not have any employees and conducts its core activities through third-party service providers, the most significant of which is the Investment Manager. When selecting third-party providers, RECI will assess each provider has an established track record and, through regulatory oversight, is required to have in place suitable policies and procedures to ensure they maintain high standards of business conduct, treat their own stakeholders fairly and employ corporate governance best practice. The Management Engagement Committee meets at least once a year for the purpose of evaluating the performance of the RECI’s service providers and any modern slavery issues identified are discussed by the Board.

Given the nature of Cheyne’s business of managing a number of investment funds and vehicles, there is a very low risk of slavery or human trafficking in connection with its activities. Cheyne does not deal in any hard goods or manufactured items, and have no offices in, nor purchase any goods directly from, any developing countries. Cheyne does not have a traditional manufacturing supply chain; Cheyne oversees the provision of financial services to support the investment funds and vehicles it manages. This predominately includes trading, execution and marketing services as well as the oversight of fund administration and asset custody services. Cheyne has a zero-tolerance approach to any form of modern slavery and 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 their supply chain. To ensure compliance, Cheyne conduct regular checks on their supply chain, including by providing their suppliers with the Cheyne Supplier Code of Conduct, provide training to their staff and operate a number of internal supporting policies. Cheyne may terminate any contract at any time should instances of modern slavery and/or human trafficking come to light.

The RECI Board has reviewed and noted Cheyne’s own Modern Slavery Statement that is available at www.cheynecapital.com/modern-slavery-statement

Board Awareness

RECI does not have any employees and is governed by a Board of non-executive directors. The directors have been made aware of the provisions of the Act and this statement has been approved by the Board. Any matters arising regarding slavery or human trafficking are escalated to the Board for discussion.

Bob Cowdell
Chairman

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