

Anti-slavery and Human Trafficking Statement

Introduction

FirstPort Limited ("FirstPort") has four decades of experience as a full-service residential property management Company.

Our active operating businesses can be found at the end of this statement.

This is our sixth Modern Slavery Statement published in response to the Modern Slavery Act 2015 (the "Act"). Since our fifth statement for the year ending December 2020, we have maintained our zero-tolerance approach to modern slavery and human trafficking. We are committed to undertaking business ethically, with a zero tolerance for modern slavery and human rights violations, child and forced labour or human trafficking in any form, in our own organisation and our supply chain.

This statement is for the period 1 January 2021 to 31 December 2021 published in compliance with the Act. It sets out steps taken by FirstPort to prevent human trafficking and slavery in our business and supply chain.

RESPONSIBILITY

The Chief Executive, on behalf of the board, is responsible for this statement. Individual Directors are accountable for compliance with the Act. Divisional Managers are responsible for their local supplier relationships and compliance with the requirement of the Act.

This statement will be reviewed and published annually on the UK Government portal and our website.

ABOUT FIRSTPORT AND ITS SUPPLY CHAIN

FirstPort operates solely in the UK and looks after over 300,000 homes on behalf of customers, landlords, developers and other property owners. We have approximately 3,400 employees and an annual turnover of £93.9 million (year ending 31st December 2021).

By putting our customers at the heart of everything we do, our vision is to be the favourite residential property manager, as judged by others.

Our principle activities include managing residential properties across the UK ranging from the common parts of large estates, to blocks of flats, retirement housing and residential lettings.

Further details of our business structure can be found on our website at www.firstport.co.uk.

We pay all of our directly employed workers at least the statutory UK National Minimum Wage or the UK National Living Wage (as applicable to the age of the worker.)

We take steps to ensure that all of our employees are eligible to work in the UK, either as part of our own recruitment process for directly employed employees or via our agency suppliers process.

Our centralised procurement function continues to manage an annual supplier spend

of approximately £160M in respect of influenceable spend (services, parts, materials and utilities). 23.5% is procured centrally with 76.5% procured locally at development level. We continue to use an online procurement system providing access to approved contractors.

Our procurement strategy will continue to focus on working with suppliers that have leading health and safety and internal governance standards, whilst also offering value for money and exceptional customer service.

These requirements align with our 'Four Pillars' approach, which ensures all our sites are delivering: Strong Health & Safety, Healthy Estate Finances, High Site Standards and Great Customer Communications.

The number of suppliers used within the FirstPort portfolio is approximately 4,200. We have a strategic intent to right-size our supply chain by prioritising the centralisation of our compliance assets to be services by carefully selected framework contractors. We recognise the need to support the local economies where our client's properties are located by utilising SME's for local trades, without compromising our supplier accreditation process, and always with a view of providing value for money.

POLICIES ON SLAVERY AND HUMAN TRAFFICKING & BUSINESS CODE OF CONDUCT

We are committed to ensuring that there is no modern slavery or human trafficking in FirstPort supply chains (which includes but not limited to business partners, suppliers, sub-contractors and other third parties who provide or deliver any goods or services to FirstPort).

We act ethically and with integrity in all our business relationships, and we have effective systems and controls to prevent slavery or human trafficking taking place in our supply chain.

We only work with companies who share our principles and who are happy to work to our policies on health and safety, ethics, prevention of tax evasion and anti-bribery and corruption. We will work with suppliers to support any improvements required, however, we will also take appropriate action if we suspect that suppliers or sub-contractors are not meeting our standards.

FirstPort has an internal Modern Slavery Policy that informs our employees of their obligations and tells them how to report any suspicions of slavery that they may have.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, we currently have systems in place to:

Identify and assess potential risk areas when considering taking on new suppliers; this includes a robust pre-qualification process for new and existing suppliers with a questionnaire specifically designed to identify risk of slavery and human trafficking in its supply chains.

Mitigate the risk of slavery and human trafficking occurring in our supply chains. We have updated our general terms and conditions to ensure full compliance with the Act.

Continue to monitor potential risk areas in our supply chains, and ensure all new contracts contain audit rights. We recently conducted a sample audit of our suppliers and no modern slavery issues were identified within the supply chain sample.

Protect whistle-blowers by operating a confidential whistleblowing helpline run by

Safecall which enables our employees and members of our supply chain to report any concerns (including any concerns regarding slavery and human trafficking). Any issues reported are investigated and dealt with promptly. We have not received any reports concerning Modern Slavery and Human Trafficking for the period covered in this statement.

SUPPLIER ADHERENCE TO THE MODERN SLAVERY ACT 2015

FirstPort has a zero-tolerance approach to slavery and human trafficking. To ensure contractors comply with the Act, we continually monitor our supply chain. Those suppliers that do not meet the required criteria are struck off the approved contractor list and can no longer perform services for and on behalf of FirstPort.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the supply chains, we continually work on our training plan for key employees within FirstPort. Our eLearning platform has been integrated into our overall employee training programme, and our Modern Slavery and Bribery and Corruption module is part of our key mandatory training for all employees.

OUR CONTINUED COMMITMENT

We recognise the importance of maintaining constant vigilance to identify and address any issues associated with slavery and human trafficking in our organisation and throughout our supply chains. We are committed to continuing to enhance our capacity to identify, prevent and mitigate any actual or potential risks.

This statement was approved by the board of FirstPort on 1 November 2022 and is made pursuant to Section 54 of the Modern Slavery Act 2015.



Ouda Saleh
Chief Executive Officer

FirstPort Limited

Date: 31 October 2022

Our active operating businesses comprises of the following subsidiary companies and are covered by this statement.

- FirstPort Limited
- FirstPort Bespoke Property Services Limited
- FirstPort Property Services Limited
- FirstPort Property Services No.2 Limited
- FirstPort Property Services No.4 Limited
- FirstPort Property Services No.5 Limited
- FirstPort Property Services No.6 Limited
- FirstPort Property Services No.7 Limited
- FirstPort Retirement Property Services Limited

- Retirement Homeseach Limited
- FirstPort Property Services Scotland Limited
- FirstPort Insurance Services Limited
- Mainstay Group Limited
- Fairfield Company Secretaries Limited
- Mainstay Facilities Management Limited
- Freemont Property Managers Limited
- Arcturus Corporation Limited
- Blenheims Estate & Asset Management Limited
- Champions Property Letting & Management Limited
- Entire Lettings & Property Management
- Fidelis Properties Ltd
- Beresford Ward Limited
- Lets Move UK Ltd