

Anti-slavery and Human Trafficking Statement

Introduction

FirstPort Limited ("FirstPort") is the largest residential property management company in the United Kingdom.

FirstPort's active operating businesses comprise the following subsidiary companies:

- FirstPort Bespoke Property Services Limited
- FirstPort Property Services Limited
- FirstPort Property Services No.2 Limited
- FirstPort Property Services No.3 Limited
- FirstPort Property Services No.4 Limited
- FirstPort Retirement Property Services Limited
- Retirement Homesearch Limited
- FirstPort Property Services Scotland Limited
- FirstPort Insurance Services Limited
- FirstPort Limited

The above subsidiaries are not required to have their own modern slavery statements as they do not meet the minimum annual turnover threshold requirement.

This is our second Modern Slavery Statement published in response to the Modern Slavery Act 2015 (the "Act"). Since our first Statement in June 2017 for the year ending December 2016, we have maintained our zero-tolerance approach to modern slavery and human trafficking and we remain committed to acting ethically, transparently and with high integrity in all our business dealings and relationships. This statement is for the period 1 January 2017 to 31 December 2017 published in compliance with the Act. It sets out steps taken by FirstPort and its Business Units to prevent human trafficking and slavery in our business and supply chain.

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 operations and our supply chain.

FirstPort have over 2500 employees and operate solely within the United Kingdom. FirstPort have an annual turnover of £55,199,000 (year ending 31st December 2017). Further details of our business structure can be found on FirstPort's website at www.firstport.co.uk.

RESPONSIBILITY

The Chief Executive, on behalf of the board has responsibility off 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 our website.

ABOUT FIRSTPORT AND IT'S SUPPLY CHAIN

FirstPort is the largest residential property manager in the UK with a turnover of £55,199,000. It manages over 3900 properties on behalf of landlords, developers and other property owners.

It is our vision for FirstPort to be the leading residential property manager as judged by others and our goal is to put our customers at the heart of everything we do.

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

FirstPort introduced a centralised procurement function who each year purchase £150m of services, parts, materials and utilities. By the end of 2017, £30m (20%) was procured centrally with £120m (80%) procured locally at scheme level using an online procurement system providing access to approved contractors. We envisage that by 31 December 2018 £65m (43%) of the procurement will be done centrally. We have a diverse supplier base of over 8500 suppliers that use a sub-contractor labour force. We are proud that we support this number of supplier companies. However, our procurement strategy is to focus on Health and Safety, corporate governance, value for money, customer satisfaction and service quality. This ties in to our key FirstPort values of Healthy Estate Finances, High Site Standards, Strong Health and Safety and Great Customer Communications. We have therefore set a goal to reduce this supplier base substantially over the coming years, whilst still ensuring we maintain business relationships with our suppliers and customers. This will make management of our suppliers more efficient and aligned to our business growth plans.

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's supply chains (which includes business partners, suppliers, sub-contractors and other third parties who provide or deliver any goods or services to FirstPort).

FirstPort have a commitment to acting ethically and with integrity in all their business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in their supply chains.

We seek to work with companies who share our principles and work according to our policies on health and safety, ethics, prevention of tax evasion and anti-bribery and corruption. We are committed to working with suppliers to support necessary improvements. However, we will also take action if suppliers and sub-contractors do not meet our standards.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, FirstPort currently has 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 its supply chains. We have updated our general terms and conditions to ensure full compliance with the Act;
- continue to monitor potential risk areas in its supply chains, and ensure all new contracts contain audit rights; and
- protect whistle-blowers by operating a confidential whistleblowing helpline run by Safecall which enables staff and members of its supply chain to report

any concerns (including any concerns regarding slavery and human trafficking). Any issues reported are investigated and dealt with promptly. We confirm we have not received any reports concerning Modern Slavery and Human Trafficking for the period stated in this statement.

SUPPLIER ADHERENCE TO THE MODERN SLAVERY ACT 2015

FirstPort is to have a zero-tolerance approach to slavery and human trafficking. To ensure contractors comply with the Act, FirstPort continually monitor its supply chains and those suppliers that do not meet the required criteria are struck off the approved contractor list.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the supply chains we are continuing to work on the creation of a mandatory training plan to provide training to key members of staff within FirstPort. This training plan will include annual class-based training as well as e-learning modules.

OUR CONTINUED COMMITMENT

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

This statement was approved by the board of FirstPort on 31 December 2018 and is made pursuant to Section 54 of the Modern Slavery Act 2015



Nigel Howell
Chief Executive Officer

FirstPort Limited

Date: 20 March 2019