

Anti-slavery and Human Trafficking Statement

FirstPort is the United Kingdom's largest residential property management company.

FirstPort's main operating businesses comprises of the following subsidiary companies:

- FirstPort Bespoke Property Services Limited
- FirstPort Property Services Limited
- FirstPort Property Services No.4 Limited (formerly Pentland Estate Management)
- FirstPort Retirement Property Services Limited
- FirstPort Insurance Services Limited
- FirstPort Limited
- Retirement Homesearch Limited

FirstPort recognises that it has a responsibility to take a robust approach to slavery and human trafficking. FirstPort is absolutely committed and intends to take a leading approach to prevent slavery and human trafficking, ensuring that its employees and supply chain are free from slavery and human trafficking.

In compliance with the Modern Slavery Act 2015, FirstPort offers the following statement regarding the steps currently being undertaken, and steps that are planned, to prevent slavery and human trafficking within FirstPort.

FIRSTPORT'S POLICY ON MODERN SLAVERY

FirstPort's Modern Slavery Policy reflects its 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 its employment practices and supply chain.

FirstPort is committed to ensuring that there is no modern slavery or human trafficking in its employment practices and supply chains (which includes employees, contractors, business partners, suppliers, sub-contractors and other third parties who provide or deliver any goods or services to the Business Units).

As part of FirstPort's initiative to identify and mitigate risk, we are working towards putting systems in place to:

- identify risk when employing staff and performing checks to ensure any potential employee or contractor has not been subject to human trafficking. Staff will be trained on the importance of being able to identify when any potential employee or contractor is subject to any slavery and human trafficking.
- identify and assess potential risk areas when considering taking on new suppliers; this includes a robust pre-qualification process for new 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 including inserting detailed provisions in all supply contracts that ensure full compliance with the Modern Slavery Act 2015;
- monitor potential risk areas in its supply chains, with appropriate audit

provisions inserted into supply contracts; and

- protect whistleblowers. FirstPort operates a confidential Whistleblowing Helpline run by an external third party 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 promptly.

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 Modern Slavery Act 2015 a full assessment of its supply chains is being planned and strategies for dealing with high risk areas will then be developed and executed that will seek to improve upon the processes detailed above.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our employment practices and supply chains, FirstPort is working on the creation of a training plan to provide training to key members of staff. This training plan will include annual class based training as well as e-learning modules.

FIRSTPORT'S CONTINUED COMMITMENT

FirstPort recognises the importance of maintaining constant vigilance to identify and address any issues associated with slavery and human trafficking in its employment practices 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 is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Knight Square's slavery and human trafficking statement for the financial year ending 31st December 2016. This statement will be reviewed and published annually.

This statement was approved by the board of FirstPort on 26 September 2017.



Nigel Howell
Chief Executive Officer

FirstPort

Date: