

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 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 Property Services No.5 Limited
- FirstPort Retirement Property Services Limited
- Retirement Homesearch Limited
- FirstPort Property Services Scotland Limited
- FirstPort Insurance Services 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 third Modern Slavery Statement published in response to the Modern Slavery Act 2015 (the "Act"). Since our second Statement for the year ending December 2017, 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 2018 to 31 December 2018 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 our website.

ABOUT FIRSTPORT AND ITS SUPPLY CHAIN

FirstPort operates solely in the UK and looks after 196,000 homes on behalf of customers, landlords, developers and other property owners. We have over 2,500 employees and an annual turnover of £56,393,000 (year ending 31st December 2018).

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

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/terms-conditions.

We introduced a centralised procurement function in June 2017 to manage an annual supplier spend of approximately £150m in respect of services, parts, materials and utilities. By the end of 2017, £30m (20%) was procured centrally with £120m (80%) procured locally at development level. We did this using an online procurement system providing access to approved contractors selected and vetted by FirstPort.

By 31 December 2018 £65m (45%) of the procurement was done centrally, and it is forecast that by 31 December 2019 £120m (80%) will be procured centrally.

Our procurement strategy will continue to focus on working with suppliers that have leading Health and Safety and corporate 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.

In the previous year we are pleased that the supplier base has been reduced from 8500 suppliers to 5,500. This is forecast to reduce to 4000 by the end of 2019. We have set a goal to reduce our supplier base further over the coming years, This will make the management of our suppliers more efficient, and is 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).

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 chains.

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 needed, however, we will also take appropriate action if we suspect that suppliers or sub-contractors are not meeting our standards.

In 2019 FirstPort launched an internal Modern Slavery Policy that informs our employees of their obligations and tells them how to report any suspicions 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.
- 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 stated 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 chains. Those suppliers that do not meet the required criteria are struck off the approved contractor list.

During 2018, a whistle-blower advised us that one of our suppliers was employing workers who were not entitled to work in the UK as they did not have the correct right to work documentation. This was investigated thoroughly and the supplier was struck off from our supplier list as they were unable to verify the right to work documents for their workers.

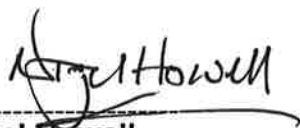
TRAINING

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 training plan for key employees within FirstPort. A new eLearning platform has been integrated into the business and we have launched a specific modern slavery module which is mandatory for all colleagues.

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 31 May 2019 and is made pursuant to Section 54 of the Modern Slavery Act 2015.



Nigel Howell

Chief Executive Officer

FirstPort Limited

Date: 04/06/19

