32 MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

placefirst	**Document Title:**	**Modern Slavery and Human Trafficking Statement**		
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Statement

Placefirst has a zero-tolerance approach to modern slavery, human trafficking, forced labour, and exploitation in all forms. We are committed to ensuring that modern slavery is not present within our business operations, supply chains, sub-contractors, or partnerships.

This statement is in line with the Modern Slavery Act 2015, and reflects our commitment to act ethically, transparently, and with integrity in all our business dealings.

Scope

This statement applies to:

- All employees of Placefirst.
- Contractors, subcontractors, consultants, and suppliers.
- Business partners and any person or entity acting on behalf of Placefirst.

Definitions

Modern slavery includes but is not limited to:

- Human trafficking
- Forced or compulsory labour
- Servitude and domestic servitude
- Debt bondage
- Exploitation through abuse of vulnerability
- Restriction of freedom through coercion, deception, or threat

Our Commitment

Placefirst will:

- Comply fully with the Modern Slavery Act 2015.
- Review internal labour practices and supply chains regularly.
- Maintain robust policies and procedures to identify and address modern slavery risks.
- Foster a culture of vigilance across the organisation.

Organisational Structure and Supply Chains

Placefirst is involved in the development, construction, and management of residential properties across the UK.

We work with a range of suppliers and contractors, primarily in the construction, facilities management, and property maintenance sectors. We acknowledge that some areas of our supply chain are at higher risk of modern slavery, particularly in construction, material procurement, and the use of subcontract labour.

Policies Supporting This Commitment

The following policies are central to preventing modern slavery within Placefirst:

- Procurement Policy
- Code of Conduct
- Whistleblowing Policy
- Equality, Diversity & Inclusion Policy
- Anti-Bribery and Corruption Policy
- Complaints Policy
- ESG (Environmental, Social & Governance) Policy

These policies are legally reviewed and included in all new starter inductions. They are also readily available on our HR system.

Due Diligence and Supplier Management

Placefirst undertakes the following due diligence processes:

- Require formal declarations from suppliers confirming compliance with the Modern Slavery Act 2015.
- Conduct pre-qualification questionnaires for all new suppliers and contractors.
- Include modern slavery compliance clauses in all contracts.
- Terminate business relationships with any supplier, contractor, or partner found to be in breach of this statement.

Risk Assessment and Management

We have identified the following higher-risk areas:

- Construction and development sites (labour supply chains).
- Procurement of construction materials and repairs parts.
- Use of third-party facilities management contractors.

To manage these risks, Placefirst will:

- Verify the right to work in the UK for all employees before contracts are issued.
- Require employment agencies to confirm compliance and complete checks

prior to engagement.
- Conduct regular training on modern slavery for employees, managers, and the Board, using webinars, e-learning, and legal briefings.
- Ensuring whistleblowing procedures are in place and communicated for reporting concerns confidentially.
- Protect whistleblowers.

Performance Monitoring

We measure our effectiveness through:

- Inclusion of modern slavery risks in policy and decision-making discussions.
- Regular review of key policies for ongoing suitability.
- Use of Management Performance Indicators within management reporting.
- Annual review and Board approval of this statement.

Continuous Improvement

Placefirst commits to:

- Ongoing review of our procurement processes.
- Regular contract updates to include modern slavery compliance provisions.
- Monitoring of suppliers for ongoing compliance.

Training and Awareness

Placefirst shall:

- Provide regular training on modern slavery to all employees managers, and the Board, using webinars, e-learning, and legal briefings.
- Include modern slavery awareness as part of the new starter induction process
- Ensure training materials are accessible online
- Monitor participation and completion of training to ensure compliance
- Update training content periodically to reflect the changes in legislation and emerging risks.

Reporting and Transparency

This statement is:

- Publicly available on the Placefirst website with a link on the homepage.
- Reviewed and updated annually.
- Approved by the Board of Directors.

Board Approval

This Statement will be reviewed and updated by 31st July each year to reflect changes in legislation, risks, or company operations.