

Slavery and Human Trafficking Statement

INTRODUCTION

Knight Square Holdings Limited (“KSHL”) is the parent company of Knight Square Limited (“Knight Square, we, us, our”). Knight Square has two main operating businesses:

- FirstPort Limited, the United Kingdom’s largest residential property manager (“FirstPort”); and
- Appello Limited, our technology driven care-at-home business (“Appello”).

This is our second Modern Slavery Statement published in response to the Modern Slavery Act 2015. Since our first Statement in June 2017, 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 Modern Slavery Act 2015 (the “Act”). It sets out steps taken by us 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.

The FirstPort and Appello businesses operate separately, and are known for the purpose of this statement as the “Business Units”. Both Business Units are organised through a number of Subsidiaries (Subsidiary being defined at Section 1159 of the Companies Act 2006). The Business Units have over 3,000 employees and operate solely within the United Kingdom. KSHL has a global annual turnover of £75,251,000 (year ending 31st December 2017). Further details of our business structure can be found on Knight Square’s website at www.knightsquare.com.

RESPONSIBILITY

The Chief Executive, on behalf of the board has responsibility off this statement. Individual Business Unit directors are accountable for compliance with the Act. Divisional Business Unit 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 OUR BUSINESS UNITS & 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

Appello is a company which provides technology enabled care services, including in particular telecare monitoring services to retirement homes. As well as providing services to the retirement homes managed by FirstPort Appello also provides services to other providers of retirement accommodation. Appello has an annual turnover of £20,052,000 and manages its own procurement independently.

All our operations are UK based.

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

The Business Units 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.

Suppliers and sub-contractors are required to maintain their own ethical sourcing policies and apply these standards to their own business, across their workforce and suppliers.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, the Business Units 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 its supply chains. We have updated our general terms and conditions to ensure full compliance with the Modern Slavery Act 2015;
- Continue to monitor potential risk areas in its supply chains, and ensuring all contracts contain the provision to audit; and
- protect whistle blowers. The Business Units continue to each operate 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. 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

We have informed The Business Units to each have a zero-tolerance approach to slavery and human trafficking. To ensure contractors comply with the Modern Slavery Act 2015 the Business Units continually monitor 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 of each

Business Unit, we are continuing to work on the creation of a mandatory training plan to provide training to key members of staff within each Business Unit. 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 its Business Units and throughout their supply chains. Knight Square 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 KSHL on 31 December 2018 and is made pursuant to Section 54 of the Modern Slavery Act 2015.



Nigel Howell
Chief Executive Officer

Knight Square Holdings Limited

Date: 21/03/19.