

# Modern Slavery and Human Trafficking Statement

## Introduction

This Modern Slavery and Human Trafficking Statement (“the Statement”) is made in accordance with Section 54(1) of the Modern Slavery Act 2015 by Civic First PLC for the period of 12 months commencing 15th February 2023. Civic First PLC is committed to trading ethically, with zero tolerance for modern slavery (including human rights violations, child and forced labour or human trafficking in any form), in our own operations and any supply chain.

## About Civic First PLC

Civic First PLC is a newly established company that provides safe and dependable transitional accommodation facilities at scale. Our fully-serviced solutions offer dignified living conditions, minimal impact on established communities and exceptional economy.

If we have a supply chain it will consist of building contractors, agency workers, product suppliers and professional consultancies including architects and land surveyors.

The activities of Civic First PLC will currently be wholly within the United Kingdom and the company’s registered office is in England.

## Policies

We are committed to valuing human rights and championing fairness by preventing modern slavery within our business and in any supply chain that we will have. We will be taking the following steps:

- Suppliers will be obliged to provide evidence of their own policies and compliance as appropriate and provide the means for workers to report or discuss non-compliances confidentially.
- We will ensure that any subcontractors ensure that their employees have the right to work in the UK, adhere to employee rights and provide evidence of CSCS cards.
- We will require all agencies and labour providers we directly engage to supply workers to be able to satisfy us that the people they supply have written employment contracts, have not had to pay for the opportunity to work, and are legally entitled to work in the UK.
- We will directly recruit and manage our employees; all of our employees will be in the UK. All of our direct employees will be as an absolute minimum, paid in accordance with the UK living wage, or London living wage (as applicable).
- We will make employees aware that the company operates a zero tolerance to modern slavery in the business.
- We will inform all our sub-contractors of our requirements regarding modern slavery and will continue to provide information on the Act and its requirements.
- We intend that the majority of the directly sourced materials will be procured from UK based suppliers that comply with the Act.
- We will continue to review our systems, policies and procedures to ensure they address modern slavery and human trafficking in all its forms within our business and supply chain.
- We will protect whistleblowers through our whistle blowing procedure which allows any employee or third party to confidentially raise a concern.
- We will carry out risk assessments, periodic reviews and comprehensive audits of suppliers and sub-contractors where there is a recognised higher risk.
- We will maintain a continuous training programme to keep employees agencies and subcontractors our requirements in relation to modern slavery and human trafficking in all its forms.

This statement has been approved by the Board of Civic First PLC.

Name ..... Robert Luck, Director .....

Signature .....  .....

Date ..... 9<sup>th</sup> May 2023 .....