

Modern Slavery

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1. Introduction

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

We are committed to acting ethically and with integrity in all our business dealings and relationships. We have a zero-tolerance approach and expect the same high standards from all our contractors, suppliers and other business partners. We expect that they will hold their own supply chain to the same high standards.

2. Scope

This policy applies to all employees of FourSynergy Group and its subsidiaries.

It also applies to all persons working for us or on our behalf in any capacity including agency workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

3. Principles

The following principles will apply to this policy:

- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
- Individuals are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Individuals are encouraged to raise concerns about any issue or suspicion of slavery and/or human trafficking in any parts of our business or supply chain at the earliest possible stage.

4. Managing risk

We encourage transparency throughout our supply chain and deliver appropriate training to colleagues to help raise awareness and knowledge.

When engaging with suppliers we seek evidence that they have appropriate policies and procedures, including Modern Slavery, Human trafficking, forced labour, human rights and whistleblowing. We do not currently engage with any international suppliers.

4.1. Relevant policies

We have a robust framework of policies in place which contribute towards the prevention of slavery or human trafficking within our organisation and our supply chains.

These include, but are not limited to, areas such as housing management, risk management, safeguarding, health and safety, recruitment, use of agency workers, whistleblowing, procurement.

We continuously review and aim to improve upon our policies to ensure they are fit for purpose.

4.2. Procurement & supply chain

Our supply chains include the sourcing of products and services related to the development and management of housing.

Our procurement activities take place in the UK and our contractors and suppliers are predominantly UK-based.

Our standard contract terms include the requirement for all suppliers to comply with the Act. These arrangements help us ensure maintenance of our standards.

4.3. Our workforce

We are committed to paying the Living Wage to all our directly employed employees. We regularly review our terms of employment to ensure that they comply with all relevant legislation.

We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency.

We respect the right of employees to form and be members of trade unions and will work together with trade unions to illicit harmonious relationships.

We employ rigorous compliancy checks to ensure the identification of persons and their right to work in the UK.

4.4. Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- conducting supplier audits or assessments where risks are identified.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan, including the termination of the business relationship.

5. Review

This policy will be reviewed and updated annually.