

Modern Slavery Act Transparency Statement

Introduction

This statement sets out the First Ark Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The First Ark Group is a unique social impact business that brings together the best aspects of Public, Private, Social Enterprise and Third Sector organisations to drive our growth. By growing our business we support positive social and economic outcomes and we're about creating success that change people's lives. The Group's mission is to deliver first class homes, products and services that enable people, places and organisations to flourish.

The Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement covers the activities of First Ark Group:

Organisational structure and supply chains

As a Group, First Ark maintains relationships with many different organisations in its supply chain. The Group currently operates within the UK and does not have intricate supply chains, multiple levels of contracting and does not partner with businesses based in impoverished regions where labour laws are non-existent or not enforced.

The Group is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

We are evolving and updating our standard tender documentation to require mandatory declarations from potential suppliers that they comply with the Modern Slavery Act 2015 as a condition of doing business. The Act includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, and we expect our suppliers to hold their own suppliers to the same high standards.

In building long term relationships with our suppliers, we seek to work with companies who share our values and who are prepared to commit themselves to meeting the requirements of this Code. We are committed to working with suppliers to support necessary improvements but we will also take action if suppliers are not prepared to work collaboratively to drive improvements.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** The Group's code makes clear to employees the actions and behaviour expected of them when representing the organisation. It strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Recruitment Policy & Agency Workers Policy** The Group uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The Group undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. We will assess any instances of non-compliance with the Act on a case by case basis and will then tailor remedial action. We will only trade with those who fully comply with the Act or those who are taking verifiable steps towards compliance.

Awareness-raising programme

The Group has raised awareness of modern slavery issues by publishing a briefing for staff on the Group's intranet.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes First Ark Groups slavery and human trafficking statement for the current financial year.



Bob Taylor – Group CEO