

Anti-slavery and human trafficking policy statement

JCF Property Management Ltd is committed to preventing modern slavery and human trafficking in all areas of our operations and supply chains. We recognise our responsibility under the *Modern Slavery Act 2015* and are fully committed to acting ethically and with integrity in all our business relationships.

This statement outlines the steps we take to ensure that slavery and human trafficking do not occur within our business or our supply chains.

This statement applies to all persons working for JCF Property Management Ltd or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

JCF Property Management Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Commitments

We have a zero-tolerance approach to modern slavery in our organisation and our supply chains. We are committed to:

- Conducting our business in a manner that respects human rights and upholds the dignity of all individuals.
- Ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain.
- Developing and implementing effective systems and controls to address and mitigate the risks of modern slavery.

Due Diligence and Risk Assessment

When employing any member of staff JCF Property Management Ltd will carry out reasonable, ethical and legally compliant checks to ensure the individual is not being exploited and that all employment is freely chosen. These checks may include

1. Right to Work in the UK Verification – following the Home Office right to work checklist
2. Proof of Identity – Confirm identity with passport, driving licence etc.
3. Proof of Address – requesting recent utility bill etc. to confirm address
4. Employment References
5. Employment Status

6. Bank Account details in the employee's own name
7. Voluntary employment confirmation – in our employment contract and during induction we ensure the employee understands that they are free to leave the job, are not being forced to work under threat or coercion and have not paid any illegal recruitment fees or been forced to surrender their documents

As part of our commitment to preventing modern slavery, we recognise that certain areas of our supply chain may carry a higher risk of labour exploitation. These higher-risk categories typically include:

- **Cleaning services** – due to the use of low-paid or migrant labour and subcontracting.
- **Maintenance and repairs contractors** – including plumbing, electrical, and general building works, where subcontracting and informal employment may occur.
- **Security services** – which often involve agency staff or night-shift work with limited oversight.
- **Landscaping and grounds maintenance** – where seasonal or casual labour may be used.
- **Construction and refurbishment work** – a well-documented high-risk sector for modern slavery in the UK, particularly when subcontracting is involved

To identify and mitigate risks related to modern slavery, we:

- Conduct appropriate due diligence when engaging new suppliers, especially those in higher-risk categories.
- Request suppliers confirm that they comply with the Modern Slavery Act 2015 and do not engage in any form of forced bonded or involuntary labour.
- Review supplier practices to ensure continued compliance with our values and legal obligations.

Reporting Concerns

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We encourage staff, suppliers, and stakeholders to report any concerns related to modern slavery or human trafficking in our operations or supply chains. Reports can be made confidentially and without fear of retaliation to any Director or Senior member of staff.

Review

This policy statement is reviewed every two years or updated as necessary to reflect changes in legislation or our business operations. The most recent version is always available on request and is published on our company website.

This policy statement was last reviewed in June 2025