

## **Anti-Slavery and Human-Trafficking Statement**

#### Introduction

This statement is made and published in accordance with section 54(1) of the UK Modern Slavery Act 2015 ("the Act"). It outlines the steps taken by Emeria Res UK Newco Limited ("Emeria UK") together with its direct and indirect subsidiaries (together "we", "our" or the "Emeria Group") to prevent modern slavery and human-trafficking during the financial year ending 31 December 2024.

# Our business, structure and supply chain

Emeria UK is a privately held company incorporated in England. Under Emeria UK, the Emeria Group conducts business through its individual operating entities in the UK.

The Emeria Group is one of the UK's largest residential property services businesses with extensive years of experience and a large well-served customer base. The Emeria Group's principal activities can be segmented into four key divisions (detailed below).

The Emeria Group's customers include institutional landlords, freeholders, developers and resident management companies. As of December 31, 2024, the Emeria Group employed approximately 4600 employees in permanent, fixed term and temporary contract positions.

The Emeria Group's supply chain includes procurement services which manage the provision of goods and services.

Our procurement strategy continues to focus on working with suppliers that have leading health and safety and internal governance standards, whilst also offering value for money and exceptional customer service.

Further detail on our four key operating business divisions is found below:

# FirstPort Group Limited ("FirstPort")

Our FirstPort offering encompasses procuring and delivering services to residential customers in communal developments – from blocks of apartments to estates and houses.

FirstPort operates solely in the UK and looks after over 365,000 homes on behalf of customers, landlords, developers and other property owners. Firstport has approximately 3,000 employees and an annual turnover of £89 million (as of the year ending 31st December 2024).

Further details of our FirstPort business structure can be found on the website at www.firstport.co.uk.

#### Innovus Group Limited ("Innovus")

Our Innovus offering encompasses the management of residential and commercial assets primarily for our investor client base. These services include, but are not limited to, asset management, building solutions and business services including consulting and surveying.



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Innovus operates solely in the UK and has approximately 400 employees and an annual turnover of £40 million (as of year ending 31st December 2024).

Further details of our Innovus business structure can be found on the website at www.innovus.co.uk.

#### Campions Group Limited ("Campions")

Our Campions residential lettings and estate agency offering encompasses property sales and the management of landlords' property.

Campions operates solely in the UK property market and has approximately 966 employees and an annual turnover of £93 million (as of the year ending 31st December 2024).

Further details of our Campions business structure can be found on our website at <a href="https://www.campionsgroup.co.uk">www.campionsgroup.co.uk</a>.

# **Knight Square Insurance ("Knight Square")**

Our specialist insurance brokerage provider, Knight Square, encompasses the procurement of a range of insurance products that have been designed specifically with leaseholders, landlords, tenants and resident management companies in mind.

Knight Square operates solely in the UK and has approximately 14 employees and an annual turnover of £4 million (as of the year ending 31st December 2024).

Further details of our business structure can be found on our website at <a href="https://www.knightsquareinsurance.co.uk">www.knightsquareinsurance.co.uk</a>.

### Our principles and values

We are committed to undertaking business ethically and acting with integrity. We have a zero tolerance for any form of modern slavery and human-trafficking and are committed to ensuring the absence of any slavery or human-trafficking in our business and supply chain. We expect the same standards in respect of our business partners, suppliers and contractors.

We are committed to conducting our business in such a manner by developing, implementing and enforcing effective systems and controls to ensure the absence of any slavery or human-trafficking. We work to the highest professional standards and seek to ensure compliance with all applicable laws, regulations and rules applicable to our business. We take our corporate and social responsibilities seriously and expect the same standards of our business partners and suppliers.

We are committed to fair employment practices and regularly review salaries, wages and benefits for our employees to ensure these are competitive. We expect the same standards of our business partners and suppliers.

We conduct diligence checks including identity and right to work verification as part of the recruitment process for employees, and education and qualification checks, where appropriate, to identify any potential red flags for modern slavery or human-trafficking. Any such red flags identified are addressed promptly by our human resources team.



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We provide various benefits to promote employee wellbeing.

#### Our policies

Emeria UK has an internal Modern Slavery Policy that informs our employees of their obligations and tells them how to report any suspicions of slavery that they may have. Additionally, our operating businesses have implemented codes of conduct describing expected standards of our employees and suppliers.

We have also implemented procurement, recruitment, health and safety, harassment and diversity and inclusion policies, among others, which detail our expected standards in these areas and to manage, mitigate and minimise the risk of modern slavery. We expect our suppliers to have implemented similar standards.

Our business terms and conditions include provisions for disciplinary action up to and including termination for non-compliance with applicable laws and regulations.

#### Whistleblowing

The Emeria Group has implemented a whistleblowing policy and a confidential, and anonymous if desired, reporting line, which encourages those who may have concerns to come forward and report issues including potential breaches of policies, laws, regulations or any other suspected wrongdoing; this includes concerns related to modern slavery and human-trafficking. All concerns raised are reviewed and investigated, with appropriate disciplinary actions and improvements to our processes, procedures and controls implemented, if necessary.

### Due diligence

Our main risk related to modern slavery and human-trafficking is in our supply chain, including procurement activities and management of third parties. We have processes in place to ensure only reputable third parties are engaged and conduct due diligence on suppliers prior to on-boarding and at periodic intervals thereafter. All property servicing suppliers and contractors are required to be Safe Contractor accredited or hold an equivalent SSIP ("Safety Schemes in Procurement") accreditation.

All third parties are expected to abide by Emeria UK standards of conduct when working for or on behalf of the Emeria Group.

### **Training**

All employees are automatically enrolled in an online training module on modern-slavery and human-trafficking on joining the Emeria Group. This training assists staff identifying potential signs of modern slavery and human-trafficking and informs them what to do in such situations and how to report potential issues and concerns. Suppliers are also expected to adhere to Emeria UK standards.

#### Monitoring and auditing

As part of our procurement strategy, we have implemented a system of performance management of key suppliers and have a zero-tolerance approach to any instances of non-compliance or non-accreditation to our safe contractor standards.

# Effectiveness

We assess any issues of non-compliance as they arise, on a case-by-case basis, and take corrective



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and remedial actions, as necessary. Senior management is committed to ensuring there is an effective control environment to address, mitigate and minimise modern slavery and human -trafficking risk in our business activities.

### **Next steps**

The Emeria Group will continue to develop and strengthen its control environment during the next financial year. Steps include:

- Recruitment of a Director of Compliance and Risk Management and Head of Environment, Social and Governance ("ESG");
- Review and update of existing policies, including codes of conduct and further development of
  policies on integrity, human rights, corporate social responsibility activities, risk management
  and investigations;
- Review and revision of the compliance framework, as necessary, including communication, training, monitoring and reporting activities; and
- · Review of supplier due diligence requirements.

### **OUR CONTINUED COMMITMENT**

We are committed to the prevention of modern slavery and human-trafficking, and we will continue to align our activities with applicable laws and regulations.

This Modern Slavery and Human-Trafficking statement has been reviewed, approved and signed by the Emeria UK CEO on behalf of the Board.

Ouda Saleh

Chief Executive Officer

Emeria Res UK Newco Limited

Date: 30 June 2025