

## **Modern Slavery Statement 2023/24**

4C Group is committed to ensuring acts of modern slavery, human trafficking, child and sexual exploitation do not occur in its business or within its supply chain. In line with the Modern Slavery Act 2015, the organisation voluntarily commits to comply with its obligations to ensure transparency within its business and its suppliers of goods and services.

This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2023/24.

This statement applies to all companies within and associated to 4C Group (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year 2023/24.

### **ORGANISATIONAL STRUCTURE**

4C Group is a property development and management company operating within the United Kingdom, Jersey and Guernsey. The Group's headquarters is located in London, with additional properties in St Albans.

The organisation is controlled by a Board of Directors, led by the Chief Executive Officer, Al-karim Nathoo. The Group's structure includes the following key divisions:

- Property Development Division: Focused on the development of residential and commercial properties.
- Property Management Division: Responsible for the management of the Group's property portfolio.
- Hospitality Division: Manages a range of hotels across key UK cities.

The Group's activities are consistent throughout the year, without any seasonal variations. Our operations include the real estate development, management, and hospitality services within the UK, Jersey and Guernsey.

Real estate management includes letting, maintaining, and overseeing properties to ensure they meet safety standards and tenant requirements, providing a comprehensive service from property acquisition to tenant management.

All labour supplied to the Group in pursuance of its operations is carried out within the United Kingdom, Jersey and Guernsey.

### **B) DEFINITIONS**

The Group considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.

- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

### **C) COMMITMENT**

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in United Kingdom and in many cases exceeds those minimums in relation to its employees.

### **D) SUPPLY CHAINS**

The Group's supply chain consists primarily of contractors providing services and goods for the properties owned and managed by the Group. This includes suppliers operating in sectors such as construction, facilities management, hospitality, and professional services. Although most of our suppliers are based in the UK, some are located in other regions. To manage procurement effectively and mitigate risks, we rely on Hilton Supply Management for monitoring and oversight.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if anything were to come to light, we would alert the supplier and seek to break ties as well as report any proven incident to the authorities.

### **E) POTENTIAL EXPOSURE**

In assessing our potential exposure to modern slavery risks, we consider factors such as the geographic regions and sectors our suppliers operate in, the nature of the work involved, and the presence of vulnerable demographic groups. While we acknowledge that no business is immune to these risks, we believe our exposure is relatively limited due to the nature of our operations and supply chains predominantly based in lower-risk regions. However, we remain vigilant and committed to ongoing due diligence and risk assessments.

### **F) STEPS**

Through Hilton Supply Management, the Group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers. Regarding recruitment, the Group conducts awareness training and provides guidance on how to report any issues.

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:

Conducted Relevant Risk Assessments, by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers.
- The presence of vulnerable demographic groups

Implemented a risk-based due diligence process for new and existing suppliers, requiring them to confirm compliance with modern slavery laws, based on eligibility criteria under United Kingdom law, and to provide detailed information on their related policies and practices.

Provide Awareness Training to all employees. This training covers recognizing the signs of modern slavery, how to report concerns, and the Group's policies and procedures for addressing these issues.

Reviewed our supplier contracts to ensure no supplier is, or is suspected, to be involved in modern slavery. We have incorporated specific clauses related to modern slavery prevention in our supplier agreements.

## **G) KEY PERFORMANCE INDICATORS**

The Group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Group or its supply chains.

Percentage of suppliers audited based on eligibility or assessed for modern slavery risks annually (Target: 100%)

Number of reported concerns related to modern slavery in our operations or supply chains, and the percentage investigated and addressed appropriately

Percentage of employees who have completed modern slavery awareness training (Target: 100% annually)

## **H) POLICIES**

The Group has the following policies which further define its stance on modern slavery:

- Modern Slavery Policy
- Supplier Code of Conduct

- Whistleblowing Policy
- Recruitment and Employment Practices Policy

#### **A) TRAINING**

The Group is committed to training and educating our team members (and team members of the managed hotel properties) on how we deal with incidents, how to report and how to prevent them from occurring. All employees will receive annual training on modern slavery awareness, reporting mechanisms, and the Group's policies and procedures related to this issue. Our managers are trained to uphold our commitment to being an equal opportunity employer, ensuring a non-discriminatory working environment, and providing support to employees throughout grievance and disciplinary processes.

4C Group will not support or deal with any business knowingly involved in slavery, human trafficking, child or sexual exploitation.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: Sept 09, 2024



Signed: Al-karim Nathoo, Chief Executive Officer