



First Locate Modern Slavery Act Statement 2023/2024

This Modern Slavery Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 30 April 2024.

First Locate is one of the UK's largest outsource resources for debt resolution and payment processing. We work with many of the UK's largest companies in Utilities, Retail and Government, offering a variety of services which includes, debt collect, trace investigations, white label solutions and business process outsourcing. We have a successful and demonstrable track record having provided our services across utility, telecoms, public & financial sectors for over 24 years.

We are committed to ensuring there is no form of modern slavery or human trafficking within any of our business activities or those of our supply chains.

Our Policies

We have a responsibility to ensure there is no modern slavery or human trafficking within our business or supply chains.

How we approach this is detailed in our **Modern Slavery and Human Trafficking policy** which sets out our code of conduct and our commitment to support and uphold the measures to safeguard against modern slavery.

Our **Whistleblowing Policy** encourages our employees to report concerns which may relate to our direct activities or those of our supply chains.

These policies are available to all employees through secured shared access and are reviewed annually for continued suitability.

Due Diligence

First Locate continues to use a risk-based approach to modern slavery in order to satisfy legal requirements whilst underpinning our own standards and expectations. We continue to observe the United Nations Guiding Principles on Business and Human Rights, (UNGPs), the UK Government Home Office Guidance Paper issued under section 54 (9) of MSA 2015 and the Global Slavery Index 2018, all of which provide direction to our due diligence activities.

As a company we continually consider the risk of modern slavery occurring in our own operations and we have continued to complete risk assessments of our supply chain using a range of risk criteria (including vendor types, categorisation of spend profile, geographies, documentation, financial risk level and associated risk levels) that has provided a risk ranking. This allows us as a business to focus ongoing efforts on our own internal operations and likewise, of those immediate supply chain partners and their extended suppliers. As a result, our Modern Slavery Action Plan drives our governance procedures.

Training

Our employees are valuable, and we recognise that the appropriate modern slavery and human trafficking training will increase their awareness as well as mitigate the risk within our business and supply chains. Modern slavery and human trafficking is therefore included within our induction courses and our annual refresher training schedule.

We will review our Modern Slavery Statement at least annually and update as necessary.

Signed,

Darren Guest

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Managing Director

For and on behalf of First Locate

