

# Modern Slavery Policy and Statement

May 2022

**CENTURY 21**  
United Kingdom

*Maurice Macneill Iona Limited  
(trading as Century 21 UK)*

## **ABOUT THIS POLICY**

Century 21 UK Limited is committed to conducting their business in a socially responsible way. Century 21 UK Limited seeks to carry out their operations in accordance with appropriate ethical standards and be honest and fair in their relationships with customers and suppliers. As part of this, Century 21 UK Limited is dedicated to ensuring that effective systems and controls are in place to safeguard against modern slavery and human trafficking occurring within our businesses or any of our supply chain.

## **SLAVERY AND HUMAN TRAFFICKING STATEMENT**

In accordance with the Modern Slavery Act 2015 (“**Act**”), Century 21 UK Limited has published this statement. This statement sets the steps that Century 21 UK Limited has taken during the financial year ending 31<sup>st</sup> March 2023 to prevent modern slavery and human trafficking from occurring within its business and supply chains. The initiatives included in this statement will continue to be implemented during 2022 and will be reported on during 2023.

### **Century 21 UK Limited**

Century 21 UK Limited is a leading provider of property services to its key customer groups:

- Services provided to consumers include property listings and advice about buying and renting a property.
- Services provided to Century 21 franchisees include compliance and business advice and provision of certain business services such as marketing material and websites.

As at 31st March 2022, Century 21 UK Limited employed circa 3 people across the UK, where its business operations are entirely based.

### **Supply Chains**

Century 21 UK Limited has established direct relationships with a number of primarily UK-based suppliers who deliver a variety of services including: professional services, utilities and telecoms, and facilities management. As part of its service delivery, Century 21 UK Limited procure services not just for themselves, but also for the benefit of franchisees.

The vast majority of services are procured via specialist individuals employed or engaged by Century 21 UK Limited (relationship managers).

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## **Policies and Contractual Provisions**

The approach of Century 21 UK Limited to the promotion of human rights and ethical issues is contained within Century 21 UK Limited HR Policies which include but not limited to:

- Anti-Bribery and Corruption Policy
- Equal Opportunities Policy
- Recruitment Policy
- Whistleblowing Policy
- Grievance Policy
- Anti-Bullying and Harassment Policy

The Century 21 UK Limited HR policies apply to all individuals employed or engaged by Century 21 UK Limited. Employees can use the whistleblowing policy to report suspected concerns within the business and supply chains.

Since the enactment of the Act Century 21 UK Limited has taken steps to seek to ensure that any new agreements with suppliers include an express obligation for suppliers to comply with the Act, to implement due diligence procedures within its own supply chains and notify Century 21 UK Limited in the event of any actual or potential incidence of modern slavery. In the event of a breach of these provisions, Century 21 UK Limited will seek to resolve any issues with its suppliers and it may also seek to terminate the relationship with the supplier where a resolution is not achieved. This provision is regularly reviewed, and relevant amendments made.

## **Due Diligence**

Century 21 UK Limited has identified our supply chains as the main area of risk and exposure to modern slavery.

The suppliers used by Century 21 UK Limited have been identified as low risk. The suppliers which provide manufactured goods to Century 21 UK Limited are very few, limited to marketing providers (providing posters etc), and software providers. Other suppliers to Century 21 UK Limited mainly provide in-person services, such as maintenance services and recruitment services.

Contractors used by Century 21 UK Limited pass through an on-boarding process, which includes terms requiring them to comply with the Act and provide a copy of their modern slavery statement where requested.

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## Areas of Risk

Overall exposure to modern slavery for Century 21 UK Limited is lower than other sectors given the nature of the property services sector in which the business operates, the types of services we procure and the fact that our business operations and those of the majority of our suppliers are primarily based in the UK.

Notwithstanding the above, Century 21 UK Limited is not complacent and understands that the procurement of recruitment and facilities services and the use of subcontractors are practices which may bring about increased risks of modern slavery within supply chains.

Accordingly, Century 21 UK Limited is taking steps to mitigate such risks, including:

- Requiring suppliers to implement due diligence procedures for its own suppliers and subcontractors
- Having in place stringent checks on our recruitment agencies and ensuring our own internal recruitment processes meet the minimum legal requirement

As part of this, Century 21 UK Limited complies with all relevant legislation including the Immigration, Asylum and Nationality Act 2006 and ensures that all appropriate checks are carried out to maintain compliance.

If further risks are identified, Century 21 UK Limited will consider such risks and take appropriate steps to address any emerging risks.

## Training

Century 21 UK Limited understands the importance of training employees to enable them to be able to identify risks of modern slavery. Century 21 UK Limited employees receive information that allows them to understand the requirements under the Act in the form of this policy. They also receive our whistleblowing policy, which would allow them to raise concerns anonymously.

## KPI Monitoring

Century 21 UK Limited appreciates that the approach to combatting modern slavery will have to adapt over time in response to findings following the completion of various risk assessments. Century 21 UK Limited intend to monitor the following KPIs over the next financial year to measure the effectiveness of the processes:

- The number of employees who have received training on modern slavery risks
- The number of suppliers we have carried out a risk assessment on

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This statement and policy have been approved on Century 21 UK Limited on 19th May 2022.

Signed by Nicholas Faulkner, Managing Director on behalf of:  
Maurice McNeill Iona Limited