

Statement on Modern Slavery and Human Trafficking

This statement sets out the Society's approach to assessing the potential risks of modern slavery and human trafficking being involved in its activities and the steps it is taking to ensure there are no such activities in its own business or its supply chains. This statement relates to the financial year ending 31 December 2017.

The Society understands that it must take a robust approach to preventing instances of modern slavery and human trafficking, and is committed to their prevention.

Structure of the organisation and its supply chains

The Society operates only in the UK and Channel Islands. It is a mutual building society providing mortgage and savings products for its members. At the end of the financial year ending on 31st December 2017, the Society had 2 subsidiaries neither of which had any employees. It has limited supply chains mostly for the provision of physical supplies, cleaning, the recruitment of staff, and specialist services such as legal and audit advice.

High risk activities

None of the Society's activities are deemed to be high risk activities for modern slavery or human trafficking.

Approach

The Society includes an assessment of the risk of instances of modern slavery and human trafficking in its overall risk assessments.

Further actions and policies include:

- **Modern Slavery Policy:** this policy is included in the Staff Handbook and sets out the Society's approach to complying with the Modern Slavery and Human Trafficking Act, and its expectations on staff to assist with its implementation.
- **Whistleblowing Policy:** encourages staff and associated workers to report activities either in the direct business of the Society or in its supply chains that could potentially involve modern slavery and human trafficking without fear of retaliation.
- **Code of Conduct:** sets out the standard of ethical behaviour expected of all staff.
- **Use of agencies for temporary staff:** the Society works only with reputable agencies and verifies the identity and background of all temporary staff.
- **Due diligence on suppliers of contract staff and physical supplies:** the due diligence process includes ascertaining that the supplier complies with the Modern Slavery and Human Trafficking Act, and that they pay their staff at least the National Minimum Wage.

Responsibility

All staff have a responsibility to adhere to all policies and the prescribed standards of ethical behaviour. Overall responsibility for ensuring that the Society's Modern Slavery and Human Trafficking policy is maintained and applied lies with the Group Secretary.

This statement has been approved by the Board and will be updated on an annual basis.