

# Board statement on slavery and human trafficking

2018

## Introduction

In December 2016, Secure Trust Bank PLC and its subsidiaries, V12 Retail Finance Limited and Debt Managers (Services) Limited (“the Group”) published its first Statement on slavery and human trafficking following the introduction of the Modern Slavery Act 2015 (the “Act”). We are committed to tackling modern slavery and human trafficking and have taken steps to ensure it is considered and addressed in our business and throughout our supply chain, consistent with our obligations under the Act.

In 2018, the Group registered with TISC Report and Modern Slavery Registry to further demonstrate its commitment to increasing transparency within its supply chain and within its own business, in tackling modern slavery and human trafficking. A copy of the Group Board Statements (from 2016 onwards) will be published on [tiscreport.org](https://www.tiscreport.org) and [modernslaveryregistry.org](https://www.modernslaveryregistry.org) websites.

## The Bank's Organisational Structure

Secure Trust Bank PLC is a retail and commercial bank, providing banking services as well as lending solutions and savings products in the financial services sector in the United Kingdom. The Group's head office is located in Solihull, West Midlands and, at 30 June 2018, the Group had 849 employees across the UK.

Our business is organised into a number of business units:-

- **Consumer Finance – motor finance and retail finance.**
- **Consumer Lending – residential mortgages.**
- **Business Finance – asset finance, commercial finance and real estate finance.**
- **Savings – notice and deposit accounts.**
- **Debt collection – debt collection activities on behalf of a range of clients.**

Our supply chain includes, but is not limited to:-

- **Construction, manufacturing and utilities.**
- **Domestic service and cleaning work.**
- **Hospitality and catering.**
- **Recruitment and employment.**
- **Information technology and software development.**
- **Financial and legal services.**
- **Marketing and advertising.**

## Policies in relation to slavery and human trafficking

Our Modern Slavery Policy reflects the Group's commitment to acting ethically and with integrity in all our business relationships. We reinforce our commitment to tackling modern slavery and human trafficking in our Whistleblowing Policy, Recruitment Policy, Procurement Policy and Corporate Social Responsibility Policy and will be updating our Anti-Bribery and Corruption Policy to address this subject. Updates to policies are communicated to our staff.

## Due Diligence Processes for Slavery and Human Trafficking

As part of our commitment to combating slavery and human trafficking within our supply chain, we have implemented a proportionate system to:-

- **Identify and assess potential risk areas in our supply chain;**
- **Mitigate the risk of slavery and human trafficking in our supply chain;**
- **Monitor potential risk areas in our supply chain; and**
- **Protect whistle-blowers.**

All our suppliers who were assessed during 2018 as potentially at risk to modern slavery and human trafficking were required to provide us with assurance of the programme they have in place to address this risk. All such suppliers were able to provide us with this assurance.

## Areas of risk for Slavery and Human Trafficking

We have actively taken steps to identify areas within our business where there is a risk of slavery and human trafficking. We do this at the point of on-boarding a new supplier and as part of an annual assessment programme of existing suppliers. During 2018, the following have been identified as potential areas where these risks may arise:-

- **Construction, manufacturing and utilities.**
- **Domestic service and cleaning work.**
- **Hospitality and catering.**
- **Recruitment and employment.**
- **Information, technology and telecommunication.**

Where we identify a supplier as being potentially at risk to slavery and human trafficking, we require them to provide us with information about their internal programme to identify and manage these risks. This could include the provision of a Modern Slavery Policy or similar setting out the steps they have taken.

## Supplier Adherence to our Values and Ethics

We operate a supply chain management process which involves the assessment and ongoing monitoring of 'critical' contractors and suppliers in line with the Third Party Supplier Management Procedure owned and managed by the Procurement Team. We inform contractors and suppliers of our zero-tolerance approach to modern slavery and human trafficking at the outset of our business relationship and as part of our ongoing supplier review process.

## Training and Awareness

We recognise the importance of providing training to our staff in order to raise awareness of the risks our business may face from modern slavery and human trafficking. In January 2018, 722 staff completed Modern Slavery e-learning via our internal Learning Management System.

During 2018, we have reiterated our commitment to tackling modern slavery and human trafficking by referencing this in our Whistleblowing Policy, Recruitment Policy, Corporate Social Responsibility Policy and Procurement Policy and communicated these Policies to our staff.

We openly encourage our staff to raise concerns about any issue or suspicion of modern slavery, in line with our Whistleblowing Policy.

## Effectiveness in Combating Slavery and Human Trafficking

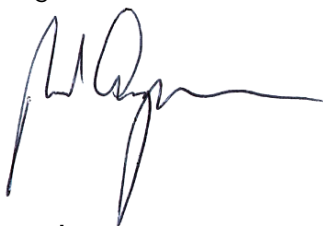
We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:-

- **All current staff to have completed anti-slavery and human trafficking training;**
- **The number of whistleblowing reports made by staff and resulting action; and**
- **The number of contractors and/or suppliers evaluated using our supplier risk assessment programme.**

We will review and monitor the effectiveness of our KPIs on a regular basis.

<sup>1</sup>This Statement is made pursuant to section 54(1) of the Modern Slavery Act and was approved by the Board on 28 November 2018. It constitutes the Group's Modern Slavery and Human Trafficking Statement for the financial year ending December 2018.

Signed on behalf of the Board:



**Paul Lynam**

Secure Trust Bank PLC Board Member and Chief Executive Officer

Dated: 26 June 2019

<sup>1</sup> This Statement was originally approved by the Board on 28 November 2018 and an amended version was approved by the Board on 26 June 2019.