

# Modern Slavery & Human Trafficking Policy Document



*Policy Owner: HR Manager*

*Version Number: 1.0      Effective Date: December 2020*

## STATEMENT OF CONFIDENTIALITY

This document is confidential to the Guarantor Loan Division (GLD) which is comprised of George Banco.com Limited trading as George Banco and TrustTwo and our parent, Non Standard Finance plc. The document shall not be disclosed outside GLD without prior written permission. In the event that such disclosure is permitted, the document shall not be copied or distributed other than on a need-to-know basis and any recipients may be required to sign a confidentiality undertaking in favour of the Guarantor Loan Division.

## Contents

<b>1. Introduction</b>	3
<b>2. Scope</b>	3
<b>3. Legislation and Regulation</b>	3
<b>4. Policy Principles</b>	3
4.1 Risk identification	3
4.2 Risk management	4
4.3 Risk monitoring and reporting	4
<b>5. Roles and Responsibilities</b>	5
5.1 First Line of Defence (Operational Management)	5
5.2 Second Line of Defence (Risk and Compliance)	5
5.3 Third Line of Defence (Audit)	5
<b>6 Associated Documents</b>	5
<b>7 Policy Governance</b>	6
7.1 Effective Date of Policy	6
7.2 Approval and Review	6
7.3 Storage	6
7.4 Policy Stakeholders	6
7.5 Policy Breaches	7
<b>8 Version Control</b>	7
<b>9 Appendix: Minimum standards</b>	8

## 1. Introduction

Modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Guarantor Loan Division ("GLD") has a zero-tolerance approach to modern slavery. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for GLD; all are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

The Board and senior management consider the risk of modern slavery in the business or its supply chain to be low.

## 2. Scope

The policy applies to:

- All business areas and functions within GLD
- All employees,
- Third parties, sourced or outsourced, working on behalf of GLD

This Policy does not form part of any employee's contract of employment and may be amended at any time.

## 3. Legislation and Regulation

The Policy is intended to comply with the Modern Slavery Act 2015.

## 4. Policy Principles

GLD has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or any of our supply chains.

GLD is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from our contractors and suppliers, and we expect that our suppliers will hold their own suppliers to the same high standards.

### 4.1 Risk identification

As a financial services provider, the business has a relatively straightforward supply chain compared with those of other sectors. The majority of products and services are sourced from suppliers based in the UK. Our supply chain includes but is not limited to:

- Domestic services (i.e. cleaning)

- Hospitality and catering
- Recruitment
- IT and software development
- Financial and legal services
- Marketing and advertising
- Utilities
- Property

GLD is opposed to slavery and human trafficking in its direct operations and in the indirect operations of its supply chain. As such, GLD will not knowingly support or do business with any organisation involved in slavery or human trafficking. As part of our procurement process and to ensure compliance with this Policy, GLD requests that key suppliers respond to an annual audit questionnaire.

## 4.2 Risk management

A range of policies and procedures are in place to help identify and mitigate risk in the business, including that of modern slavery and human trafficking, and to ensure appropriate behaviours throughout GLD. These include:

- Third Party Risk Management Policy
- Anti-Money Laundering & Combatting Terrorist Financing Policy
- Whistleblowing Policy
- Equal Opportunities Procedure
- Health & Safety Policy
- Recruitment Procedure

Our Policy on anti-slavery and human trafficking reflect both our commitment to acting ethically and with integrity in all our business relationships and also to fulfilling our obligations under the Act.

Training will be provided to all staff to raise awareness of the issues surrounding modern slavery and human trafficking as well as to highlight risks they can pose to our business. This training is repeated annually. Individuals employed in roles that are to be deemed 'high risk' will receive more in-depth training that will be reviewed annually and repeated if deemed necessary.

The zero-tolerance approach to modern slavery must be communicated to all suppliers and contractors and the outset of the business relationship and reinforced as appropriate thereafter.

## 4.3 Risk monitoring and reporting

GLD uses a series of key performance indicators (KPIs) to help ensure that modern slavery and human trafficking is not taking place in any part of the business or in any of the supply chains. These include the following:

- All staff are required to complete anti-slavery and human trafficking training
- All whistleblowing reports made by staff and the resulting actions are recorded
- Selected suppliers are asked to provide information around their compliance to modern slavery

GLD will review and monitor the effectiveness of these and any additional KPIs on a regular basis.

## 5. Roles and Responsibilities

As the policy owner, the HR Manager has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and dealing with any queries about it.

GLD operates a traditional Three Lines of Defence model whereby each function has clearly defined responsibilities and accountabilities. The responsibilities in relation to anti-slavery and human trafficking are as follows:

### 5.1 First Line of Defence (Operational Management)

- As the First Line of Defence, operational managers own and manage risks. They are also responsible for implementing corrective actions to address process and control deficiencies.
- Management at all levels is responsible for ensuring those reporting to them understand and comply with this Policy and, if appropriate, are given training on the issue of modern slavery in supply chains.
- All are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the business or supply chains of any supplier tier at the earliest possible stage.
- If it is believed or suspected that a breach of this Policy has occurred, or that it may occur, it must be reported to either a manager, HR Manager, or reported in accordance with the Whistleblowing Policy as soon as possible.
- If it is unclear about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chains, constitutes any of the various forms of modern slavery, it should be raised with a manager or the HR Manager.

GLD aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment could include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure which can be found on SharePoint.

### 5.2 Second Line of Defence (Risk and Compliance)

The Board of Directors has overall responsibility to ensure this Policy complies with our legal and ethical obligations, and that all staff, contractors or other persons working on our behalf comply with it.

### 5.3 Third Line of Defence (Audit)

An outsourced internal audit function provides the Board, the Non-Standard Finance Audit Committee and Senior Management with comprehensive assurance on the effectiveness of governance, risk management, and internal controls, including the manner in which the First and Second Lines of Defence achieve risk management and control objectives.

## 6 Associated Documents

This Policy must be read in conjunction with the following:

- Whistleblowing Policy
- Third Party Risk Management Policy

## 7 Policy Governance

### 7.1 Effective Date of Policy

This policy will be known as the Modern Slavery Policy. It will be effective from the date of the approval of the policy as identified on the front page.

### 7.2 Approval and Review

This Policy must be approved and managed in accordance with the Policy Management Framework. The Policy Management Framework requires the identification of a Policy Owner (or delegates), who will have overall responsibility for the effectiveness of the Policy, and stakeholders, who must approve the Policy (and any amendments to it) for their area of responsibility.

The Policy Management Framework requires the Policy to be approved at RisCC and/or the Board, or other relevant committee, and to be subject to an annual review cycle. Outside of this review period, the Policy must be reviewed, and edited accordingly, in light of any material, operational, regulatory or industry insights which impact it.

The next review date for this policy is November 2021.

### 7.3 Storage

The approved policy will be stored in the Policies folders.

### 7.4 Policy Stakeholders

Role	Title	Holder	Responsibility
Policy owner(s)	HR Manager	Emily Pulman	Overall responsibility for ensuring the efficacy of the policy/procedure within the division.
Stakeholder	Chief Executive Officer	Mark Burgess	Board approval
	Risk and Compliance Director	Richard Webb	Consideration of risk to the business in incidences of policy breach

## 7.5 Policy Breaches

Breaches of this Policy may be identified by the business via reported incidents or second line assurance and oversight. Non-compliance with this Policy will amount to a breach, which must be reported to the HR Manager without unreasonable delay. The HR Manager will assess the materiality and impact of the breach and report to the CEO and appropriate Committee.

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

GLD may terminate its relationship with other individuals and organisations working on its behalf if they breach this Policy.

## 8 Version Control

Version Ref	Author of change	Description of change	Effective Date
V1.0	Emily Pulman	Changes made to the ELL policy to reflect GLD's new legal structure.	November 2020

## 9 Appendix: Minimum standards

Minimum standards 1 – 6 evidence how these principles are discharged.

		Frequency	Responsibility
1	The business is aware that the Policy is in place which sets out the principles for prevention, detection and reporting of modern slavery in part of our business or supply chains. It is widely publicised across the business and is communicated to all relevant personnel and stakeholders.	Ongoing	HR Manager
2	The Modern Slavery and Human Trafficking Training Awareness Module will be available on T100 and its content will be reviewed to ensure that it remains compliant with legal and regulatory obligations. The review of the Module also ensures compliance with GLD's Policy requirements.	Yearly	HR Manager
3	All staff will complete the T100 Modern Slavery and Human Trafficking Awareness Module, and will be aware of the law and their obligations under it and will be regularly trained in how to recognise slavery and human trafficking. Appropriate records of completion will be created, maintained and retained in accordance with the applicable law and Group Policy.	Yearly	HR Manager
4	Process and Procedures are in place for reporting internal suspicious activity to the HR Manager.	Ongoing	HR Manager
5	Appropriate due diligence is undertaken on selected suppliers and contractors to ensure that they adhere to the Modern Slavery Act 2015.	Ongoing	COO
6	All whistleblowing reports made by staff and the resulting actions are recorded.	Ongoing	Head of Risk and Compliance