Modern Slavery Statement 2025

Julian Hodge Bank Limited (Hodge) is making this statement under the provisions of Section 54, part 6 of the Modern Slavery Act 2015 following its financial year end of 30 September 2024.

This statement sets out the steps taken by Hodge to ensure that neither slavery nor human trafficking (together, 'Modern Slavery') occur within its own operations or supply chains.

Under the statutory guidance on Modern Slavery for England & Wales under s49 of the Modern Slavery Act 2015, the Home Office states modern slavery as encompassing human trafficking, slavery, servitude and forced or compulsory labour. The definition of a victim of human trafficking, slavery, servitude and forced or compulsory labour is set out in the Slavery and Human Trafficking (Definition of Victim) Regulations 2022.

About Hodge

Hodge is an independent, privately-owned financial services group operating from its head office in Cardiff. We employ around 300 people and for more than 50 years, we've shared the same simple mission: to make a positive difference for our customers and communities. This ethos is in our DNA as a registered charity, The Jane Hodge Foundation, charity registration no. 216053, is our ultimate beneficial owner with a 79% interest.

Our strategic vision is underpinned by our people and our investment in our colleagues. Our culture is what makes us special and ultimately what delivers our purpose to make a positive difference for our customers and communities.

Our aim is to open financial possibilities where options seem limited. Helping a family get a mortgage, saving for that dream or investing in, or developing, property. All of our customers get much more than just products - we give them simple solutions and support when they need it most

Our colleagues

Our values of Trusted Expertise, Genuine Empathy and Bold Flexibility, alongside our supporting policies, reflect our commitment to always act ethically and with integrity.

We have a whistleblowing policy which enables colleagues to report any concerns related to our business dealings. The policy is designed to ensure matters raised under this policy are investigated thoroughly, promptly and confidentially and without fear of victimisation. Additionally, we have a 'Speak Up, Speak Out' framework which allows all colleagues to gain information and signposting on all available ways to raise concerns, including through colleague networks, People Services, the Employee Assistance Programme or the whistleblowing policy and the support available to all colleagues in doing so.

We communicate this statement to all our colleagues to ensure there is a high level of understanding of the risks of modern slavery to our businesses and to our supply chain.

National Living Wage

Hodge is committed to being a fair and reasonable employer and ensures that salaries remain competitive within its market through a variety of methods, including role evaluations and external benchmarking. We ensure that all colleagues are paid above the national living wage, regardless of age.

Supply chains – outsourcing and third parties

Whilst Hodge's third-party and supplier relationships are mostly with firms in the United Kingdom and are therefore considered to be low risk based on jurisdiction, and very limited number of firms in US in low-risk sectors (such as Technology/software licenses), Hodge nevertheless takes a proactive approach to identifying, assessing and addressing the risk of modern slavery and human trafficking.

Hodge embeds appropriate ethical, environmental and social requirements into its procurement activities including at the pre-qualification, specification and evaluation stages to ensure that Hodge is engaging with suppliers that share its commitment to sound environmental and ethical performance and improvement, including with regard to Modern Slavery.

Hodge encourages its suppliers to adopt or improve their ethical standards where necessary themselves, and within their own supply chains. Hodge expects suppliers to respect the human rights of its staff, prohibit the use of modern slavery (in all its forms) within their supply chains and to comply with all relevant legislation, regulations, and directives. This includes awareness and mitigation of the risk of modern slavery in the countries and communities in which they operate and ensuring compliance with the UK Modern Slavery Act 2015, where relevant. The procurement staff at Hodge subscribe to and follow the principles of the Chartered Institute of Purchasing & Supply's Professional Code of Conduct.

Governance and risk management

A governance and risk management framework are in place to support adherence to policies/procedures and to identify risks faced by Hodge.

This is based on a “three lines of defence” model which includes the front line being responsible for risk identification, assessment and mitigation; the second line providing oversight and third line providing independent assurance.

Hodge has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings with relationships. Any suspicions in this regard would be investigated immediately, and if proven would result in the cessation of the relationship and referral to the relevant authorities.

This Statement is signed on behalf of the board of Julian Hodge Bank Limited by David Landen, Chief Executive Officer.



Dated: 6th February 2025