Modern Slavery Statement 2023

Introduction

At Fleet Mortgages we take full responsibility in ensuring our business conducts itself lawfully, ethically, take care of our people and have a zero tolerance for any form of abuse to human rights including modern slavery. Understanding there is a customer at the end of our processes and having strong values embedded across the company ensures we are always looking to provide good outcomes in everything we do.

This statement details the steps taken by Fleet Mortgages Limited to prevent modern slavery in its business and any activities therein. This includes our due diligence measures, policies, risk assessment, training and our systems and controls in combatting modern slavery.

Fleet Mortgages Limited's Modern Slavery Statement has been published in line with the UK Modern Slavery Act 2015. This statement covers the financial year ending 31st March 2023.

Fleet Mortgages Business

Fleet Mortgages was established in 2014 as a specialist lender who provides non regulated buy to let mortgages where the end customers are primarily professional and semi-professional landlords or first-time landlords operating on a professional basis. All of our business is introduced via IFA's, networks and clubs, and other introducers who are regulated by the FCA.
Our head office is based in Fleet Hampshire and we have a satellite office in Cardiff along with various field based roles.
We have a strong family and inclusive culture across the business and only employ staff who are the best fit, not only for the role but also for the culture of the company.
All funding for the lending activity carried out by Fleet Mortgages from 2014 until 2021 was provided by numerous funding partners. In 2021 Fleet Mortgages was acquired by Starling Bank who now provide 100% of its funding for any mortgages established after this point.

Policies

Fleet Mortgages is committed to ensuring that no offences to human rights or modern slavery occur within its business, operating processes or supply channels.
To do this we operate a robust policy management framework where all policies are reviewed and where required, update at least annually. The policies are kept up to date by the appropriate business areas in accordance with the policy management framework and communicated to all employees either via training or internal communications.
The policies in place provide clear guidance for all Fleet Mortgages employees on the minimum standards expected to help maintain the culture and values within the company.
There are several policies in place that either directly or indirectly address the risks pertaining to human rights or modern slavery and ensure compliance with the act. These Policies include our HR Policies/Handbook, Recruitment Policy, Disclosures in the Public Interest Policy and Anti Bribery and Corruption Policy

Risk Assessment and Due Diligence

Recruitment

Fleet Mortgages Limited has assessed the risks within the HR and employment policies with modern slavery is low.
There is a robust recruitment process followed for all new employees whether these are for permanent, contract or temporary roles although temporary and contract positions are minimal.
Within the recruitment process, all employees are thoroughly vetted prior to work commencement of employment and there is a clear and fair pay structure in place for all roles. The vetting process also includes, right to work in the UK, criminal record checks and references.

Lending Activity

Fleet Mortgages Limited operate in the buy to let sector and lend to professional and semi-professional landlords or first-time landlords operating on a professional basis.
Prior to offering a loan to a customer, due diligence measures are completed on the applicant, the funds used, the company where applicable and the property.
Should any concerns be identified at any stage throughout this stage of the application with the customer, the property or the tenants, these are escalated, thoroughly investigated and reported through the appropriate channels depending upon the type of concern raised.

Suppliers and Third Parties

All third party companies that work with, for or on behalf of Fleet Mortgages undergo due diligence checks prior to commencement of the relationship.
The measures in place are risk based depending upon the type of relationship Fleet Mortgages have with the other company and all are monitored in accordance with the Act either directly or by a third party supplier management company for our conveyancers and valuers.
The due diligence assessments take place at onboarding, time bound and event driven.
If a breach of the Act or any other concerns are identified during these assessments, the appropriate action is taken by way of investigating the situation to gain a full understanding, discontinuing the relationship and reporting the issue via the appropriate channels.

Training

Fleet Mortgages have a dedicated training function who provide all employees with the relevant training required to complete their roles and to ensure they are aware of the applicable legislation they are required to follow. The delivery of this training is mainly classroom based and interactive with some training modules being delivered via elearning.
All employees undergo a standard induction programme with the training team to ensure consistent delivery. Following the induction staff are then provided with role specific training which will cover, where required, how to identify and report any suspicions or concerns relating to the Act.

Plans for the Coming Year

For the next financial year, Fleet Mortgages are going to:

- **introduce additional training to the business with a module designed for Modern Slavery**
- **Address any actions identified within the risk assessment and monitor these through to completion**
- **share the outcome of actions and any enhancements in the 2024 Modern Slavery Statement.**

Sign off

Signed:

Damian Thompson
CEO Fleet Mortgages

Signed:

Philip Tebbatt
Chief Legal and Compliance Officer