Anti-Slavery Statement 2022

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

We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in any part of our business or anywhere in our supply chains.

Our organisation structure and supply chains
We aim to build long-term relationships with all our customers and to offer a broad range of exceptional and personalised financial services and expertise to our customers.

To provide these, we procure a range of goods and services from third-party suppliers who may, in turn, enter into sub-contracts with their suppliers. We may also, from time to time, outsource some of our non-customer-facing functions to suppliers.

We conduct our business guided by our core values honesty, empathy, excellence, and social responsibility and our purpose to be good bankers and good citizens. We recognise this can only be achieved by addressing the interests of all of our key stakeholders, which includes the wider community in which we operate, and by addressing risks throughout our supply chain, including in relation to modern slavery.

As part of our initiative to identify and mitigate risk, we make clear to our suppliers our expectations of business behaviour and, where possible, we build long standing relationships with them.

Our policies in relation to modern slavery and human trafficking
We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that there is no modern slavery anywhere in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects this commitment.

Our Chief Risk & Compliance Officer is responsible for overseeing the implementation of our Anti-Slavery Policy and the annual preparation of our modern slavery statement.

Our due diligence processes for modern slavery and human trafficking
To monitor potential risk areas in our supply chains on an ongoing basis, we carry out due diligence on high-risk suppliers who are headquartered in countries ranked highly on the Walk Free Foundation s Global Slavery Index, which measures the estimated prevalence of modern slavery.

Risk assessment and management
We expect all those in our supply chain to comply with our values and ethics. To this end, in addition to the ongoing due diligence discussed above, we have set in place the following measures:

> We have developed a risk assessment methodology to assess the risk of modern slavery occurring in our supply chains. When a new supplier is on-boarded, we carry out a risk

assessment of that supplier - which requires the supplier to complete a questionnaire and to provide us with a copy of their own modern slavery policy and, if applicable, published modern slavery statement - and give them a green, amber or red rating. This rating is then updated periodically.

If a supplier is assigned a red or amber rating, we provide that supplier with a copy of our Anti-Slavery Policy and include provisions in our contract with them that obliges them to comply with the policy and the requirements of the Modern Slavery Act 2015.

We also have a policy and systems in place to encourage the internal reporting of concerns and the subsequent protection of whistle blowers.

Training on modern slavery and human trafficking

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we provide annual training to all staff.

Measuring our effectiveness in combating modern slavery and human trafficking

To date, we have not discovered any violations of our Anti-Slavery Policy.

If we discover a violation of our Anti-Slavery Policy, we will respond in a manner proportionate to the nature and extent of the violation. Serious violations will require immediate and decisive action and may result in the termination of the business relationship. For less serious violations, we will allow the supplier reasonable time to develop and implement a plan for remediation.

We have established a dedicated strategic sourcing and supplier management department and are committed to enhancing the strategic sourcing and supplier management tools designed by the department. We have established and are committed to maintaining, relationship owners for, and regular engagement with, our critical suppliers. These interactions with key suppliers give us continued confidence in the robustness and integrity of our critical supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31st March 2022.

Approved by the Board on 22nd September 2022.

SIGNATURE (SIMON HOARE)



Partner
22/09/2022