



Our zero tolerance policy

Modern Slavery Act 2015



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Modern slavery and human trafficking - they shouldn't still be happening, but they are. With the Modern Slavery Act of 2015, the UK government called on businesses to announce, every year, what they're doing to make sure there's no slavery or human trafficking in any of the organisations they do business with.

So here's a summary of how we're helping in the fight. This is our slavery and human trafficking statement for the financial year ending 31st December 2017.

A little bit about us

Who we are

We're a small, traditional bank, operating solely in the UK. We have over 150 employees working out of offices in Leicester, Birmingham, Bristol and Sheffield.

What we do

We have a classic approach to banking. We help customers save and borrow money. We help people grow the small businesses that help local and national economies prosper.

As of 31st December 2017, we have an annual turnover of £39m, from property finance, asset finance and savings products.

Who we do business with

We like to support local businesses in everything we do. So our supply chain includes small British companies as well as international suppliers. Most of the suppliers for goods and services we use are based here in the UK.

How we exercise our zero tolerance policy

We do everything we can to be ethical and trustworthy in all aspects of our business. Here's how we work our policy on modern slavery and human trafficking into this philosophy.

We scrutinise all our suppliers

We think carefully about the businesses we're looking to work with. We have sensible checks in place to assess whether they are ethical, stable and trustworthy. Over the next year we will be adding checks for modern slavery into the mix and if we ever have any concerns about slavery or trafficking in a particular business, we will report it and refuse to do business with them.

Our legal team checks our relevant supplier agreements are consistent with all the appropriate laws, and if we need to, we run the agreements past our HR, IT and Business Development teams too.

We're writing a new procurement policy that'll set out this process clearly.

We'll soon be training all our staff to be on the lookout

We want all our staff to know and understand the risks of people being exploited. So we're planning a new training programme that'll make sure we all know how to spot the warning signs in our business and supply chain.

We're making it one of the ways we measure our success

Like most businesses, we use key performance indicators (KPIs) to measure how well we're doing in different areas of our business. Most KPIs are based on productivity and performance statistics, but we're taking it a step further.

From next year, we'll be looking at what KPIs we can set to measure how well we're enforcing our zero tolerance policy on slavery and trafficking -ensuring it's not happening in our business or supply chains.

Considering our supply chain, this is quite limited and covers suppliers in the following areas; office services, IT and consultants. Given the nature of our suppliers, our due diligence processes and that our suppliers are mostly UK businesses, we consider our supply chain to be low risk. The Board has received no reports of slavery and human trafficking in our supply chain.

We'll update you on our progress again next year

We support the government's call to arms on this issue. We are starting our journey to understand and identify what we can do to help in the fight to end modern slavery and human trafficking, and we'll update our statement with our latest actions every year.



Mike Kirsopp, Chief Executive Officer
Cambridge & Counties Bank

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