

Board statement on slavery and human trafficking

2017

Introduction

In December 2016, Secure Trust Bank PLC (“STB”) published its first Statement on slavery and human trafficking following the introduction of the Modern Slavery Act 2015 (the “Act”). We are committed to tackling modern slavery and human trafficking and have taken steps to ensure it is considered and addressed in our business and throughout our supply chain, consistent with our obligations under the Act.

The Bank's Organisational Structure

Secure Trust Bank PLC is a retail and commercial bank, providing banking services as well as lending solutions and savings products in the financial services sector in the United Kingdom. STB operates from head offices in Solihull, West Midlands and, at 30 June 2017, STB and its subsidiaries (the "Group") had 769 employees across the UK.

Our business is organised into a number of business units:-

- **Consumer Finance – motor finance and retail finance.**
- **Consumer Lending – residential mortgages.**
- **Business Finance – asset finance, commercial finance and real estate finance.**
- **Savings – notice deposits and deposit bonds.**
- **Debt collection – debt collection activities on behalf of a range of clients.**

Our supply chain includes, but is not limited to:-

- **Construction, manufacturing and utilities.**
- **Domestic service and cleaning work.**
- **Hospitality and catering.**
- **Recruitment and employment.**
- **Information technology and software development.**
- **Financial and legal services.**
- **Marketing and advertising.**

Policies in relation to slavery and human trafficking

Our Modern Slavery Policy reflects the Group's commitment to acting ethically and with integrity in all our business relationships.

Due Diligence Processes for Slavery and Human Trafficking

As part of our commitment to combating slavery and human trafficking within our supply chain, we have implemented a proportionate system to:-

- **Identify and assess potential risk areas in our supply chain;**
- **Mitigate the risk of slavery and human trafficking in our supply chain;**
- **Monitor potential risk areas in our supply chain; and**
- **Protect whistle-blowers.**

Areas of risk for Slavery and Human Trafficking

We have actively taken steps to identify areas within our business where there is a risk of slavery and human trafficking. The following have been identified as potential areas where these risks may arise:-

- **Construction, manufacturing and utilities.**
- **Domestic service and cleaning work.**
- **Hospitality and catering.**
- **Recruitment and employment.**
- **Information, technology and telecommunication.**

Supplier Adherence to our Values and Ethics

We operate a supply chain management process which involves the assessment and ongoing monitoring of 'critical' contractors and suppliers in line with the Third Party Supplier Management Procedure owned and managed by the Procurement Team. We inform contractors and suppliers of our zero-tolerance approach to modern slavery and human trafficking at the outset of our business relationship and as part of our ongoing due diligence process.

Training and Awareness

Training is provided to staff in order to raise awareness of the risks our business faces from modern slavery and human trafficking.

Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:-

- **All current staff to have completed anti-slavery and human trafficking training;**
- **The number of whistleblowing reports made by staff and resulting action; and**
- **The number of contractors and/or suppliers evaluated using our supplier risk assessment programme.**

We will review and monitor the effectiveness of our KPIs on a regular basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's modern slavery and human trafficking statement for the financial year ending December 2017.

Signed on behalf of the Board:



Paul Lynam

Secure Trust Bank PLC Board Member and Chief Executive Officer

Dated: 24 November 2017