

Modern Slavery and Human Trafficking Statement 2020

This statement sets out Harpenden Building Society's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains.

The Society is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

The Society is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. We provide our services through the Society's Branches, online and member contact centres.

The Society is a single entity and does not operate outside of the UK.

The Society's supply chain includes many suppliers of goods and services that we buy from the external market. This includes services such as cleaning and goods such as office consumables, corporate clothing and IT software. Wherever possible, the Society builds long standing relationships with local suppliers and key third parties.

Relevant policies

We operate the following policies that ensure we prevent slavery and human trafficking in our operations:

- **Whistleblowing policy** We encourage all our workers to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain.
- **Procurement Policy** We are committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Supplier due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing all aspects of the supply chain
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

All key third parties have been assessed and are predominantly located within the UK. The Society has undertaken due diligence on all third parties during 2020 and has good knowledge of their businesses. The Society, therefore, has assessed that the risk of Modern Slavery and Human Trafficking is low.

Training

We require all Society employees with procurement responsibilities to complete an online training course on modern slavery.

The Society remains committed to doing all that it reasonably can to contribute toward helping eradicate modern slavery and human trafficking and will continue to keep policies and procedures under review in 2021.

Sarah Howe

CEO