

# Modern Slavery & Human Trafficking Statement

VERSION: July 2024

## INTRODUCTION

In accordance with the Modern Slavery Act 2015 (“Act”), we have published this statement on behalf of the Company and relevant subsidiary companies (the Group). This statement sets out the steps that the Group has taken during the financial year ending 31<sup>st</sup> March 2024 to prevent modern slavery and human trafficking from occurring within our business and supply chains. The initiatives included in this statement will continue to be implemented during 2024 and will be reported on during 2025.

We are committed to conducting our business in a socially responsible way. Our business seeks to carry out their operations in accordance with appropriate ethical standards and be honest and fair in their relationships with customers and suppliers. As part of this, we are dedicated to ensuring that effective systems and controls are in place to safeguard against modern slavery and human trafficking occurring within our business or any of our supply chains.

## ORGANISATION STRUCTURE

Through its subsidiaries the Group is a leading provider of property services to its key customer groups:

- Services provided to consumers include financial services (mortgage network services, mortgage brokerage and protection and general insurance brokerage services)
- Services are provided to mortgage brokers include mortgage network services for appointed representatives and directly authorised firms and software distribution.

Our financial reporting includes one division:

- Mortgages

As of 31<sup>st</sup> March 2024, the Group employed through its subsidiaries circa 152 people across the UK, where its business operations are entirely based.

## OUR SUPPLY CHAIN

The Group has direct relationships with a number of primarily UK based suppliers who deliver a variety of services including professional services, utilities, telecoms, and facilities management. As part of its service delivery the Group procure services for the benefit of some of the customers of Group subsidiary companies.

The Group has taken steps to seek to ensure where possible that any new agreements with suppliers include an express obligation for the supply to comply within the Act, to implement due diligence procedures within its own supply chains and notify the Group in the event of any actual or potential incident of modern slavery. When contractors sign up with the Group, they agree to terms which require them to comply with the Act. In the event of a breach of these provisions, the Group will seek to resolve an issue with suppliers, and it may also seek to terminate the relationship with the supplier where a resolution is not achieved. This provision is regularly reviewed, and relevant amendments made.

## OUR POLICIES

Led by our core values of “create a better future”, “back each other”, and “do the right thing”, the approach of the Group to the promotion of human and ethical issues is contained within its policies which include but are not limited to:

- Modern Slavery and Human Trafficking Policy
- Anti-Bribery and Corruption Policy
- Equality and Diversity Policy

- Recruitment and Selection Policy
- Whistleblowing Policy
- Grievance Policy
- Anti-Bullying and Harassment Policy

These policies apply to all individuals employed or engaged by the Group. Employees can use the Whistleblowing Policy to report suspected concerns within our businesses and supply chains.

### DUE DILIGENCE

Most services are procured via specialist individuals employed or engaged by the Group. The suppliers used by the Group have been identified as low risk. The suppliers which provide manufactured goods to the Group are very few, limited to marketing providers (providing posters etc), facilities providers (providing toiletries etc) and food and drink suppliers (local catering companies and high street supermarkets). Other suppliers to the Group mainly provide in-person services, such as maintenance and services and recruitment services.

### AREAS OF RISK

The Group does not operate in high-risk geographies and considers its workforce to be low risk.

Overall exposure to modern slavery for the Group is lower than other sectors given the nature of the property services market in which our businesses operate. The types of services we procure and the fact that our business operations and those of most of our suppliers are primarily based in the UK.

Notwithstanding the above, the Group is not complacent and understands that the procurement of recruitment and facilities management services and the use of subcontractors are practices which may bring about increased risk of modern slavery within supply chains. The Group recognises the link between modern slavery and money laundering and has increased training in this area.

Accordingly, we are taking steps to mitigate such risks, including:

- Requiring suppliers to implement due diligence procedures for its own suppliers and subcontractors.
- Having in place stringent checks on our recruitment agencies and ensuring our own internal recruitment process meet the minimum legal requirements.
- Taking steps to include training on modern slavery risks as well as anti-money laundering for all employees.

The Group complies with the relevant legislation including the Immigration Act 2016 and ensures that all appropriate employment checks are carried out to maintain compliance.

If further risks are identified the Group will consider such risks and take appropriate steps to address any emerging risks.

### TRAINING

The Group understands the importance of training employees to enable them to be able to identify the risks of modern slavery. Employees receive information that allows them to understand the requirements under the Act in the form of the Modern Slavery and Human Trafficking Policy. They also receive the Whistleblowing Policy and training, which allows them to raise concerns anonymously.

### KPI MONITORING

The board intend to monitor/implement the following KPIs over the next financial year to measure how effective the processes have been:

- Number of employees and appointed representatives who have received training on modern slavery risks.
- Implement risk assessments/modern slavery questionnaires and carry out across a minimum of 20% of all suppliers.

This 2024 statement was approved by the Stonebridge board on 18 July 2024 and applies to the financial year ending 31<sup>st</sup> March 2024.

Signed by Robert Clifford (CEO)

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