

Statement on Modern Slavery and Human Trafficking

This statement sets out the Family Building's Society's approach to assessing the potential risks of modern slavery and human trafficking being involved in its activities, and the steps it is taking to ensure there are no such activities in its own business or its supply chains. This statement relates to the Financial Year 2024.

The Society understands that it must take a robust approach to preventing instances of modern slavery and human trafficking and is committed to their prevention.

Structure of the Organisation and its Supply Chains

The Family Building Society has four subsidiary companies: Counties Home Loan Management Ltd, National Counties Financial Services Ltd, Ebbisham No. 1 Ltd, and Smart Money People Limited and its wholly owned subsidiary, Be Clever with Your Cash. In addition, the Society has a majority interest in Family & Arden Homes LLP. National Counties Financial Services Ltd is dormant. Neither Counties Home Loan Management Limited nor Family & Arden Homes Limited have any employees. Ebbisham No. 1 is a Special Investment Vehicle and has no employees. Smart Money People Limited (and Be Clever With Your Cash) have independent management and operate independently of the Family Building Society. The group operates only in the UK. Family Building Society is a mutual building society providing mortgage and savings products for its members. It has limited supply chains mostly for the provision of physical supplies, cleaning, the recruitment of staff, and specialist services such as IT, and legal and audit advice.

High Risk Activities

None of these are deemed to be high risk activities for modern slavery or human trafficking.

Approach

The Society includes an assessment of the risk of instances of modern slavery and human trafficking in its overall risk assessments.

Further actions and policies include:

- **Modern Slavery Policy:** this policy is included in the Staff Handbook and sets out the Society's approach to complying with the Modern Slavery and Human Trafficking Act, and its expectations on staff to assist with its implementation.
- **Staff training:** staff undertake training to help them understand the concept of modern slavery and what to do if they suspect there may be an issue.
- **Whistleblowing Policy:** encourages staff and associated workers to report activities either in the direct business of the Society or in its supply chains that could potentially involve modern slavery and human trafficking without fear of retaliation.

- Code of Conduct: sets out the standard of ethical behaviour expected of all staff.
- Supplier Code of Conduct: sets out the standards of conduct the Society expects of its suppliers
- Use of agencies for temporary staff: the Society works only with reputable agencies and verifies the identify and background of all temporary staff.
- The Society's suppliers are subject to due diligence checks before entering into a contract, as part of which we require sight of the third party's policy on modern slavery and human trafficking. Where appropriate, we ensure our third-party contracts contain clauses regarding modern slavery.
- Due diligence on suppliers of contract staff and physical supplies: the due diligence process includes ascertaining that the supplier complies with the Modern Slavery Act 2015 and that they pay their staff at least the National Minimum Wage.

Responsibility

All staff have a responsibility to adhere to all policies and the prescribed standards of ethical behaviour. Overall responsibility for ensuring that the Society's Modern Slavery and Human Trafficking policy is maintained and applied lies with the Chief Executive.

This statement has been approved by the Board and will be updated on an annual basis.