

Nottingham Building Society's Modern Slavery Act and Human Trafficking Statement 2024

This statement sets out the actions which we've taken to understand modern slavery risks related to our business and to put in place steps designed to ensure that no slavery or human trafficking exists either within Nottingham Building Society's business, or within our supply chain. This statement relates to actions and activities during the financial year 1 January 2024 to 31 December 2024.

Our Business

Nottingham Building Society is a top 10 UK building society, providing savings accounts and mortgages from thirty-one locations across eight counties. We employ around 525 staff.

In addition, through referrals to third parties, we work with several financial services providers to deliver a range of complementary products and services to our colleagues and members such as financial planning and investment advice.

We source a range of goods and services from IT hardware to corporate clothing, with an approved supplier list. Our supply chain for goods and services is not complex, with the majority of procurement being sourced from suppliers based in the UK.

Our Supply Chain

We monitor Modern Slavery risks in our supply chain by conducting due diligence on our suppliers periodically. When our *risk profiling* processes consider there may be a Modern Slavery risk to the society, either because of the nature of the Goods or Services provided by a Supplier, or the location of the Supplier, our *due diligence* processes will assess the Supplier's modern slavery risks and controls prior to contract and include appropriate contracting protections.

Risk Profiling

We understand that our biggest exposure to Modern Slavery is our supply chains and risk profiling our suppliers helps us focus our efforts where they are most needed. Supplier risk profiling may consider the following (where relevant):

- the types of goods / services and the country they are provided from;
- how much we spend with the supplier, both now and in the future; and
- the length of relationship we have with the third party.

The risk profiling will be conducted prior to signing a contract with a third party and at least annually thereafter, or when we are made aware there has been a significant change to the services provided by the third party which may impact the risk to Modern Slavery.

Due Diligence

We take a risk-based approach to our supplier due diligence. The due diligence includes:



- assessing goods provided against modern slavery and human trafficking risk;
- evaluating the modern slavery and human trafficking risks of all suppliers that present a modern slavery risk;
- implementing action plans where deficiencies have been identified and working with the third party to ensure improvements are made.

Our Colleagues

We are committed to conducting ourselves honestly and with integrity, striving for fairness in everything we do including how we treat our colleagues.

We start training our colleagues at induction and all staff are given specific training on how to identify and report suspicions regarding Modern Slavery; this includes an annual knowledge check to ensure this remains a focus for all our staff.

We have policies in place which ensure our employment practices mitigate the risks identified in the Modern Slavery Act, including:

- Our colleagues are not subject to forced labour and have the freedom to terminate their employment at any time, without penalty;
- Our colleagues will not be charged any fees for recruitment;
- The confiscation or withholding of any worker identity documents is strictly prohibited;
- Our workplace is free of any form of harsh or inhumane treatment and reinforced through staff training;
- Our colleagues irrespective of their nationality, are treated fairly and equally;
- Our colleagues are paid at least the minimum wage required by law and wages are paid at regular intervals, directly to the member of staff;
- Our colleagues are not required to work in excess of the legally mandated number of hours;
- Any and all overtime is voluntary, and no colleague will be required to work overtime under the threat of penalty or dismissal.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Nottingham Building Society on 29th April 2025.

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Sue Hayes, Chief Executive Officer

Nottingham Building Society

