


# Modern Slavery Statement



Report title	Modern Slavery Statement
Author(s)	Rob Ewin, Senior Legal Counsel & Company Secretary
NBS Purpose	
Purpose of this paper:	To undertake the annual review of the Statement to meet the requirements of the Modern Slavery Act 2015.
Actions:	<b>Board is requested to APPROVE the Statement and questions are welcomed</b>
External references:	Government consultation documents.
Governance route and signoffs including changes as a result:	Reviewed by ExCo and recommended to board for approval without amendment.  The Statement has been updated from the previous year to reflect current numbers of staff and branches.

## The Nottingham's Modern Slavery Act Statement 2022

This statement sets out the actions which The Nottingham has taken to understand all potential modern slavery risks related to its business and to put in place steps designed to ensure that no slavery or human trafficking exists either within The Nottingham's business, or within its supply chain. This statement relates to actions and activities during the financial year 1 January 2022 to 31 December 2022.

### Our Business and Supply Chain

The Nottingham is a top 10 UK building society, providing savings accounts, mortgages, insurance, estate planning and investment advice from thirty-one locations across eight counties. The Nottingham Group comprises The Nottingham Building Society and its subsidiary companies Nottingham Property Services Limited, Harrison Murray Limited and HM Lettings Limited. In addition to manufacturing its own products, The Nottingham partners with several financial services providers to deliver a wide range of complementary products and services to our members. The Nottingham employs around 450 staff.

The Nottingham sources a range of goods and services from IT hardware to corporate clothing, with an approved supplier list of around 270 companies. Our supply chain for goods and services is not complex, with the majority of procurement being sourced from suppliers based in the UK.

### Policies and Contractual Terms

We are committed to conducting ourselves honestly and with integrity, striving for fairness in everything we do including how we treat our employees. We ensure that all our staff are aware that they can confidentially report any concerns, including cases of unethical behaviour, and we review every case that is reported and take appropriate action. We have policies in place which ensure our employment practices mitigate the risks identified in the Modern Slavery Act, including:

- Workers are not subject to any forced labour and have the freedom to terminate their employment at any time, without penalty, given the length of notice specified;
- Workers 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, as outlined in our Equality, Diversity and Inclusion Policy and reinforced through staff training;
- All workers, irrespective of their nationality, are treated fairly and equally;
- All workers are paid at least the minimum wage required by law and wages are paid at regular intervals, directly to the member of staff;
- Workers are not required to work in excess of the legally mandated number of hours;
- Any and all overtime is voluntary, and no worker will be required to work overtime under the threat of penalty or dismissal.

We expect our suppliers and partners to act in the same way.

We assess potential suppliers' Modern Slavery risk and controls prior to contracting with them to ensure we only work with companies who support our policies on Human Trafficking. We ensure third party contracts contain clauses regarding Modern Slavery and constantly assess that our suppliers are adhering to their contractual and ethical responsibilities surrounding Modern Slavery by requiring

our material suppliers to conduct regular Modern Slavery risk profiling within their own supply chains, implement appropriate controls to prevent Modern Slavery and notify us immediately if they become aware of any incidents of Modern Slavery within their supply chains. Where any of our suppliers are required to maintain a Modern Slavery Statement, we retain a copy of the Statement as part of our onboarding process and due diligence checks and we will not engage with a supplier who does not produce a Statement where they are required by law to maintain one.

## **Risk Profiling**

We understand that our biggest exposure to Modern Slavery is in our supply chains and risk profiling our suppliers will help us focus our efforts where they are most needed. Risk profiling is conducted by the business area utilising the services provided and will consider:

- the country which the services 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 third party which may impact the risk to Modern Slavery.

We will review the profiling to ensure the oversight we have is commensurate to the risk each third-party poses, and when on-boarding new third parties, we will ensure we understand any risks that arise.

## **Due Diligence**

The Nottingham takes a risk-based approach to the due diligence it applies to its third parties. The due diligence includes:

- mapping the supply chain to assess geographical risk of modern slavery and human trafficking;
- assessing goods provided against modern slavery and human trafficking risk;
- evaluating the modern slavery and human trafficking risks of all new suppliers;
- conducting third party profiling where modern slavery has been identified as a risk;
- implementing action plans where deficiencies have been identified and working with the third party to ensure improvements are made; and
- invoking sanctions against third parties that fail to improve their performance in line with action plans, including the potential termination of the relationship with the supplier.

## **Performance Indicators**

We understand the Modern Slavery risk is not static and we will therefore continue to reassess our approach in the year ahead. In order to assess the effectiveness of our approach we will review the following KPIs:

- The proportion of relevant staff who have completed training on Modern Slavery; and

- The proportion of our suppliers to whom the Act applies, and who have published their own Modern Slavery Act statement.

## Training

We start training our staff at induction, via our Whistleblowing and Dignity at Work training packages, 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.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved  
by the Board of  
The Nottingham Building Society on 25th January  
2023



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Sue Hayes, Chief Executive Officer  
The Nottingham Building Society