



**stonebridgegroup**

MORTGAGE & FINANCIAL SERVICES

## Modern Slavery and Human Trafficking Policy

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## 1. Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, appointed representatives, registered individuals, contractors and suppliers.

Stonebridge Mortgage Solutions Ltd (Stonebridge) strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

## 2. Commitments

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us, on our behalf or with us. Staff must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our policy, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
  - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our policy.
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to our policy.
  - As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers

for their compliance with our policy.

- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This will include considering terminating such relationships.

### 3. Expectations

Stonebridge adhere to the following standards and expect those involved in any stage of our supply line to follow the same standards:

- Respect the human rights of their employees and comply with all relevant legislation, regulations and directives.
- Prohibit forced labour (slavery) and human trafficking in their supply chain and give their employees the right and ability to leave employment if they choose.
- Prohibit child labour.
- Ensure that wages meet legally mandated minimums without unauthorised deductions.
- Provide clear and uniformly applied disciplinary and grievance procedures including prohibiting mental, physical or verbal abuse.
- Ensure working hours are in accordance with local regulation and industry practice and voluntary overtime is at a manageable level.