

Modern Slavery Statement

Financial year ending December 2022



This modern slavery statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Gatehouse Bank plc's UK anti-slavery and human trafficking statement for the financial year ending 31 December 2022. This statement was approved by the Gatehouse Bank plc's board on 7 July 2023.

Introduction from the Chief Executive Officer

It continues to be a priority for Gatehouse Bank to ensure that we operate ethically, responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

We are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. Our values are grounded in Shariah principles which means we follow a set of principles derived from Islamic teachings, promoting fair play and ensuring financial affairs are handled responsibly. This is at the core of what we do and therefore any form of human rights abuse is in clear contradiction to our beliefs.

This statement highlights our organisational structure, supply chains, relevant policies on tackling slavery and human trafficking risks, as well as due diligence processes, risk assessment and management. This is our first year of meeting the necessary requirements to publish a modern slavery statement and therefore we are taking steps over the coming year to ensure that we are able to properly address, manage and minimise risks associated with modern slavery.

We intend to build on our approach going forward, as we understand that the risks associated with modern slavery are dynamic and evolving as a result of multiple factors.

We understand the changing nature of the world we live in and how this can affect risk factors, so will continue to closely monitor our supply chain and business as a whole to ensure it retains the high standards needed.

Structure of the organisation

This statement has been prepared for Gatehouse Bank plc ("Gatehouse", "Gatehouse Bank", "We", "Us", "Our"). Gatehouse Bank plc is a Prudential Regulation Authority (PRA) and Financial Conduct Authority (FCA) regulated bank headquartered in London, UK. Gatehouse Bank plc is part of a real estate focused shariah-compliant financial services group, and our ultimate parent company is Gatehouse Financial Group Limited, which is registered in Jersey.



Gatehouse Bank plc is a public limited company incorporated and registered in England and Wales. Gatehouse Bank plc has two wholly owned subsidiaries, Gatehouse Build To Rent Group Limited and Ascend Estates Limited, both of which are also incorporated and registered in England and Wales but do not meet the threshold required to have a separate modern slavery statement under the UK Modern Slavery Act 2015.

Our business

Our business has 199 employees based in London, Milton Keynes and Wilmslow. In the financial year ending 31 December 2022, Gatehouse Bank had a global annual turnover of £32.9m. We do not work in sectors and regions that are high risk in respect to modern slavery. Despite this we are committed to ensuring there is no modern slavery or human trafficking within our supply chain or business and are dedicated to taking appropriate steps to facilitate this.

To find out more about the nature of our business, please click [here](#).

Our supply chains

Given the nature of our business and that we operate in the UK only, we consider we are at low risk in respect of modern slavery and human trafficking. All our current policies are integrated into all processes as part of the supplier on-boarding process, and suppliers are aware of our Sustainable Procurement Policy. Currently, we undertake communications around corporate social responsibility with our brokers and will include our suppliers in these communications in the future.

We mainly work with companies connected to technology provision or recruitment/employee relations in addition to professional services (such as legal).

Our goods and services are primarily sourced in the UK, and we have Outsourcing, Sustainable Procurement and Anti-Bribery policies, as well as a Health, Safety & Environment policy which relate to suppliers and procurement. To the best of our knowledge, we are not aware of any incidents of modern slavery or human trafficking associated with our supply chain, but we are looking to improve processes to ensure we can monitor this going forward.



Our policies

We intend to ensure that appropriate policies are in place to underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our current policies (many of which are relevant to combatting modern slavery in their own right) on at least an annual basis. We also make suppliers aware of our relevant policies and require they adhere to the same high standards.

We are committed to producing an Anti-Slavery Policy this financial year ending 2023 to reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We already have the following policies in place that are relevant to modern slavery:

- Anti-Bribery and Corruption Policy;
- Health, Safety & Environmental Policy;
- Sustainable Procurement Policy; and
- Whistleblowing Policy.

Gatehouse Bank is committed to the highest standards of ethical conduct and integrity across its operations and all its business activities.

Due diligence processes

General

At Gatehouse Bank, we are a socially responsible, ethical, fair and transparent bank and were named the Best Ethical Savings Provider three years in a row. Our position is that we will not enter into or have relationships with entities or individuals known to be involved with any sort of human rights abuses, which includes such things as child labour and modern slavery. If any evidence of supplier involvement in slavery or human trafficking comes to light, we would no longer work with the relevant supplier/individual. Our standard due diligence process is in accordance with our anti-money laundering and credit policies.



As part of our initiative to identify and mitigate risk we have adopted due diligence procedures whereby we audit our suppliers via a compliance and operations risk review. Under Gatehouse Bank's upcoming environmental, social and governance ("ESG") initiative, we intend to include ESG specific questions (including some modern slavery specific questions), which is expected to commence in Autumn 2023.

Our procedures are designed to:

- Identify and assess potential risk areas in our supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide adequate protection for whistle-blowers.

Our Whistleblowing policy provides a process for our employees to raise concerns about wrongdoing or similar concerns (which could include modern slavery) internally or externally in line with the internal arrangements that we have in place or to the Prudential Regulation Authority or Financial Conduct Authority directly. This process enables any concerns to be investigated appropriately and independently to ensure they are dealt with, and appropriate action is taken.

Customers

We ensure robust processes are undertaken to verify customers who open accounts with us, such as relevant risk assessments and a customer identification process. We also take appropriate action where a concern is raised, e.g. by not establishing a relationship with a customer who does not meet the requirements of our Anti-Money Laundering and Counter Terrorist Financing Policy and reporting suspicion of money laundering to the relevant authorities in accordance with our regulatory obligations.

Risk and Compliance - supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a Sustainable Procurement Policy dedicated to help us understand and manage the ESG impact of our operations through our supply chain. We are also committed to improving our impact on people and planet, of which our Sustainable Procurement Policy helps us understand and manage.



Part of the mandatory requirements for onboarding new suppliers or renewing contracts with suppliers requires staff to consider the supplier's ESG performance, including reviewing the way they manage their impact on society (e.g., by complying with the Human Rights International Labour Organisation conventions and ensuring slavery is not taking place in their supply chain).

Third parties we work with have to comply with all applicable laws, regulations and standards necessary and have to confirm that they have not been involved in any human trafficking or activity concerning slavery (as defined under the Modern Slavery Act 2015). We ensure all our suppliers adhere to our current policies and enforce a strict code of compliance.

Our Compliance and Operational Risk team conduct reviews of certain material suppliers on a periodic basis, based on their significance to our business, to ensure they remain appropriate suppliers.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are looking to invest in educating our staff and will provide a specific training module to assist them in recognising the risks of modern slavery and human trafficking in our business and supply chains. The intention is that this will be provided as part of the annual staff training schedule for 2023.

Our effectiveness in combating slavery and human trafficking

As this is our first year of meeting the necessary threshold for publishing a modern slavery statement, we intend to conduct a review of our operations to bring insights on ways we can tackle slavery and human trafficking and introduce reporting on modern slavery. We intend to use the following key performance indicators (KPIs) to assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:



KPI	Action	Measure
Reporting	Incorporate a way of reporting any modern slavery risks.	Track the number of incidents raised in relation to modern slavery or human trafficking
Training	Provide training for all staff.	Measured via % of staff who have completed their training.
Policies	Ensure that the policies and procedures we have in place are adequately addressing the modern slavery risks we face.	Measured by level of adherence to policy and ongoing reduction in any potential risk areas.
Reviewing of material suppliers	Compliance and Operational risk team to review material suppliers.	Number of compliant suppliers per review.

We understand that modern slavery is not always a clear risk and therefore we will look to track our progress via key performance indicators to help audit our progress.

Further steps

We intend to take the following further steps to combat slavery and human trafficking:

- Extend communication around ESG to cover suppliers in the future (currently this communication is only in respect of brokers);
- Include ESG specific questions (in addition to some modern slavery specific questions) in the upcoming ESG initiative;
- Conduct a modern slavery review and undertake a review of reporting mechanisms;
- Develop an Anti-Slavery and Human Trafficking Policy;
- Implement training on modern slavery as part of the annual staff training schedule, in addition to ESG training currently offered to all staff.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Gatehouse Bank's slavery and human trafficking statement for the financial year commencing 1 January 2022 and ending 31 December 2022.

This statement was approved by the board on 7 July 2023.

A handwritten signature in blue ink, appearing to read 'Charles Haresnape'.

Signature:

Charles Haresnape, Chief Executive Officer
Gatehouse Bank plc

7 July 2023