

# Slavery and Human Trafficking Statement 2018

## Introduction

This Statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (the Act) and covers the period from 1 January 2018 to 31 December 2018. This statement sets out the measures that Charter Court Financial Services Group plc and its subsidiary companies (the Group) are taking to combat slavery and human trafficking in their business and their supply chains.

## Our Structure and Business

Charter Court Financial Services Group plc is a FTSE listed company and its Group includes the following wholly owned subsidiaries:

- Charter Court Financial Services Limited (CCFSL) a provider of savings and mortgage products in the financial services sector. It is authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA) and the PRA and its brands include Charter Savings Bank, Precise Mortgages and Exact Mortgage Experts.
- Charter Mortgages Limited (CML) a mortgage lender which is authorised and regulated by the FCA.
- Exact Mortgage Experts Limited (EMEL) provides services to other Group companies.

The Group currently has 641 employees primarily located at its head office in Wolverhampton, an office in London and operates exclusively in the UK.

## Our supply chains

Our supply chains include suppliers of goods and suppliers of services in respect of maintenance of our premises, IT systems, software, catering and recruitment and mortgage intermediaries.

## Our policies on Slavery and Human Trafficking

We are committed to ensuring that no modern slavery or human trafficking takes place in our supply chains or in any part of our business. Internal policies exist which aim to ensure we engage in good practice and act ethically and with integrity and, where appropriate, these policies have been adapted to encompass the outcomes the Act seeks to achieve.

## Due Diligence processes for Slavery and Human Trafficking

The Group has zero tolerance to slavery and human trafficking. As part of our initiative to identify and mitigate risk we:

- identify and assess potential risk areas in our supply chains, grading the risks accordingly, and
- enhance the due diligence undertaken on suppliers considered to be high risk and incorporate appropriate anti-modern slavery provisions in our contracts with them.

These arrangements supplement various internal policies such as our Recruitment, Procurement, Outsourcing and Whistleblowing Policies.

## Training

We provide guidance to the business owners responsible for recruitment and those having responsibility for engagement and oversight of suppliers which includes guidance on the risks of modern slavery and human trafficking in our supply chains as appropriate to the risk and their role.

## Our effectiveness in combating Slavery and Human Trafficking

We record key performance indicators (KPIs) to measure 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. These indicators include:

- the number of high risk suppliers;
- the number of contracts with suppliers assessed as high risk which include an anti-Modern Slavery clause.

This statement has been approved by the Board of Charter Court Financial Services Limited and Charter Court Financial Services Group plc who will review and publish an updated statement annually.



Ian Lonergan  
Chief Executive Officer

13 March 2019