

## **Modern Slavery Act Statement**

### **Slavery and Human Trafficking Statement made on behalf of Coventry Building Society and its subsidiaries Godiva Mortgages Limited and ITL Mortgages Limited further to section 54 of the Modern Slavery Act 2015**

## **ORGANISATION'S STRUCTURE AND BUSINESS**

Coventry Building Society is a financial services provider based in Coventry, United Kingdom. The Society provides retail savings products, and the Society and its wholly owned subsidiaries Godiva Mortgages Limited and ITL Mortgages Limited (together 'the Society') provide mortgage products. The Society does not have a presence outside the United Kingdom.

Coventry Building Society has been looking after its members' finances for over 135 years and today we are proud of our record as one of the UK's strongest building societies. We are now the second largest building society in the UK with assets in excess of £49 billion, serving over 2 million members and employing over 2,500 staff. We provide competitive savings and mortgage products to our members, jobs and career development for our employees, and social and economic benefits to our local communities.

The simplicity of our business model, focussing as it does purely on savings and residential mortgages means that we do not lend to businesses and do not have exposure to 'unethical' sectors.

## **THE SOCIETY'S SUPPLY CHAINS**

The Society does not manufacture or supply any goods. The Society's suppliers support our functions and the retail financial services we provide to members and customers. The Society's suppliers are subject to due diligence checks before we enter into contracts, as well as regular ongoing risk monitoring.

All the Society's call centres are UK-based and operated by the Society and the majority of the Society's suppliers are also UK based.

## **OUR APPROACH TO SLAVERY AND HUMAN TRAFFICKING**

The Society has zero tolerance to slavery and human trafficking and is committed to taking all reasonable steps to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Because of the nature of the Society's business and its supply chains, following careful consideration, we consider that the risk of the presence of slavery or human trafficking in our supply chains is low. However, the Society is not complacent in relation to these issues.

Our policy is to require all our suppliers to comply with applicable legal requirements, including in relation to modern slavery and human trafficking. The Society's Policies state:

**Modern slavery** – Suppliers will ensure that employees are treated fairly and ethically, and that there is no slavery, servitude, forced/compulsory labour, or human trafficking.”

**Forced Labour** – Suppliers will not use any forced labour, which means any work or service performed involuntarily under threat of physical or other penalty. Suppliers shall respect the freedom of movement of its workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment.

**Child Labour** – Suppliers will not directly (or indirectly through the use of its subcontractors) employ any children under the age of 16.

When bidding for new appointments, suppliers are required to confirm their compliance with these requirements.

Following appointment, we operate a programme of supplier relationship management activities. Where any concerns arise, a full assessment is made and appropriate actions are taken to address those concerns.

We see our approach to Procurement and Supplier Relationship Management as an effective measure in carrying out our zero tolerance approach to slavery and human trafficking.

### **Training our staff**

We provide all of our staff with training that’s relevant to them. We also ensure our management teams have additional support which includes guidance to make sure our recruitment process is consistent and our approach to managing suppliers is effective. We have given, and will continue to give, extra training to colleagues who regularly work with and have a level of operational responsibility for managing our third party suppliers on the Modern Slavery Act 2015.

### **Controls and Oversight throughout 2019**

During 2019, the Procurement Function undertook a comprehensive review and redesign of the process for assessing risks associated with suppliers. This included a detailed review and enhancement of the supplier question-set in relation to slavery and human-trafficking risks. This ensures all suppliers that go through the due diligence process undertake a robust assessment to demonstrate their compliance. In addition, the Society appointed dedicated supplier due diligence specialists to review and interrogate suppliers’ responses including those relating to slavery and human trafficking

In addition to the above the 2019 Procurement Strategy outlined the increased commitment to socially responsible sourcing. The following steps have been applied throughout 2019 and will continue to be enhanced throughout 2020:

### **Contracting**

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The Society's template supply contracts include supplier obligations in relation to slavery and human trafficking compliance and training

### Monitoring

Monitoring of the "gateway questions" and supplier due diligence has taken place throughout 2019 and no concerns or issues have been identified in relation to slavery or human trafficking within the Society's supplier base during 2019.

### Next Steps

We regularly review our approach to tackling modern slavery and human trafficking. This helps us engage with suppliers to identify any ethical trading issues and incidents of slavery or human trafficking and take appropriate action.

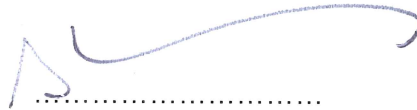
**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Society's slavery and human trafficking statement for the financial year ending 31 December 2019.**

Thank you for taking the time to read the Society's statement.

For and on behalf of:

**Coventry Building Society**

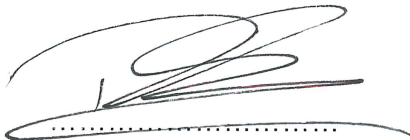
Director



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**Godiva Mortgages Limited**

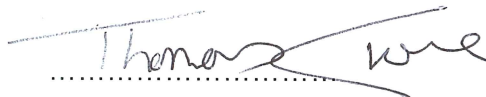
Director



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**ITL Mortgages Limited**

Director



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Date... 23/04/2020

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