

## Slavery and Human Trafficking Statement made on behalf of the 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

The Coventry Building Society is a financial services provider based in Coventry, England. 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 is owned by its members and employs around 2,000 staff (all of which are checked to ensure that they can legally work in the UK). The Coventry Building Society's Board is accountable to the Society's members for the operation of the Society.

### THE SOCIETY'S SUPPLY CHAINS

The Society does not manufacture any goods. The suppliers to the Society are largely appointed to support the Society's property and IT estate, and to support retail financial services provided to members and customers.

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

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 relatively low. However, the Society is not complacent in relation to these issues.

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.

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 Procurement and Supplier Relationship Management Policy states:

**“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 18.

**Diversity and Inclusion** - Suppliers will hire, compensate, promote, discipline, and provide other conditions of employment based solely on an individual's performance and ability to

do the job. Suppliers will not discriminate based on a person's race, sex, age, nationality, marital status, ethnic origin, or any legally protected status"

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

Following appointment, we manage suppliers with 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.

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 2016.

For and on behalf of:

**Coventry Building Society**  
Chief Executive



**Godiva Mortgages Limited**  
Director



**ITL Mortgages Limited**  
Director



Date: 19/1/17