



**This statement is made on behalf of Belmont Green Finance Limited trading as Vida Homeloans (referred to as “Vida” or “the Company”) pursuant to section 54 of the Modern Slavery Act 2015.**

This statement was approved by Anth Mooney, CEO, following the filing of the Company’s annual accounts, and approved by the Board of Directors at its Board meeting on 23 June 2023.

Belmont Green Finance Limited is registered in England and Wales, with the registered number 09837692 and registered office at 1 Battle Bridge Lane, London SE1 2HP. Vida Homeloans is a trading name of Belmont Green Finance Limited.

This statement sets out the steps taken by Vida to ensure that slavery and human trafficking risk is managed in our business and supply chains.

### **Vida’s Business and Structure**

Vida is a specialist lender based in the United Kingdom. The Company provides mortgages to customers who may fall outside the criteria of mainstream lenders. Our products are designed to be prudent and deliver good customer outcomes and are distributed under the “Vida” brand. The Company was established in 2015 and as at the date of its 2022 Annual Report and Accounts, had assets of £2billion and an annual equivalent turnover of c. £100million. We have c.10,400 customers and employ over 170 colleagues. Our head office is in London, and we have two other operational sites across the UK, but we have adopted an agile working model.

### **Culture and Values**

The Company demonstrates respect for human rights and is committed to managing modern slavery and human trafficking risks in our business and in our supply chains. Our colleagues are committed to acting ethically and with integrity in all business relationships and to implementing proportionate and effective systems and controls to ensure slavery and human trafficking risk is managed in our organisation and in our supply chains.

Our culture and values reflect this – we are first and foremost a caring organisation. This ethos sits at the heart of our Vida Values, driving the way we run our business and interact with all of our stakeholders every day.

Our VIDA Values are:

**Visionary:** We learn by breaking old habits and innovating to find creative solutions to problems.

**Inclusive:** We value each other’s differences and work hard to see people for who they really are.

**Dynamic:** We embrace change and get results by taking decisive action.

**Authentic:** We build trust by being honest, straightforward and by keeping our promises.



## **Policies**

As part of ongoing initiatives to identify and mitigate risk, Vida has in place systems and policies covering our customers, colleagues and suppliers to ensure that we aim to:

- Identify and assess potential risk areas in our business, mortgages and supply chain;
- Monitor potential risk areas and mitigate the risk of modern slavery or human trafficking taking place in our business, mortgages or supply chain;
- Protect against funds containing proceeds of crime obtained through modern slavery or human trafficking entering our business through strict money laundering safeguards; and
- Enable whistleblowing and protect the anonymity of whistle-blowers.

Our approach to modern slavery risk is to ensure that management of this inherent risk is considered across all business areas and relevant policies, including the Enterprise Risk Management Framework.

### *Lending policy*

In relation to the properties we lend on, we have specific lending conditions in place to ensure that houses of multiple occupancy are appropriately licensed and that every property has a valuation, which would highlight any safety concerns within the scope of the assessment and suitable for rental. This might include, for example, conditions being imposed on improvements where needed. Where we become aware of modern slavery or human trafficking violations relating to a property which we have lent on or are intending to lend on, we will take appropriate action and support the authorities in any investigation.

### *Outsourcing and Supplier policy*

In addition, we have policies and procedures in place to ensure proportionate due diligence is carried out on potential and existing suppliers, appropriate supplier relationship management is carried out, and all relevant legislation and regulation is adhered to by our suppliers. Requirements are set out in accordance with the level of risk assessed by Vida in respect of each supplier and service provided.

### *ESG policy*

We are in the process of establishing a new ESG Policy covering areas relating to our Environmental, Social and Governance Strategy which includes our policy on managing modern slavery and human trafficking risk within Vida itself. The ESG Policy sets out what action will be taken if any instances of modern slavery are found. Any instances of modern slavery or human trafficking affecting any employee should be reported to the HR team where appropriate support can be provided. Breaches of the ESG Policy are reported through governance.



### *People policies*

We undertake regular updates to, and monitoring of, health and safety guidance and policies and review of working from home practices, including through colleague surveys and health and safety assessments. An Agile Working Policy has been embedded to support colleagues along with our new employee value proposition and we are committed to paying the Government's national living wage to all colleagues directly employed by Vida.

### *Whistleblowing Policy*

Our Whistleblowing Policy and supporting procedures ensure that concerns can be raised effectively, including those relating to modern slavery and human trafficking. All concerns are investigated, and individuals can notify appropriately trained colleagues (Whistleblowing Champions) where appropriate. A person may elect to remain anonymous and their identity is therefore treated as confidential. Reports made under the Whistleblowing procedure are tracked by our Compliance team and reported through our governance structure. Our Whistleblowing Policy makes it clear that any individual raising concerns will not suffer any form of detriment or recrimination by Vida as a result and this is supported throughout the investigation procedures.

### *Financial Crime policies*

We are committed to the prevention of financial crime and, through risk-based internal procedures, policies and systems and controls, strive to ensure that high standards of crime prevention and awareness are maintained. Our Financial Crime Framework and associated policies set out the overarching principles and mechanisms which identify, mitigate and manage financial crime risk, as we seek to protect our customers and the Company.

### **Training and Awareness**

We provide all colleagues with training, relevant to them and their role, including mandatory financial crime modules. We also offer specific online training on modern slavery and human trafficking in financial services, which emphasises the role of the financial services industry in combatting this risk, explains the different types of modern slavery, and gives detail on possible 'red flag' indicators. Colleagues are provided with a short guide covering these areas, which is published internally and available to review at any time.

Training is provided on our Outsourcing and Supplier Policy to ensure colleagues onboarding suppliers can assess modern slavery risk and manage this appropriately. The new ESG Policy will be rolled out across the Company in 2023.

### **Supply Chain Risks**

The Company does not manufacture or supply any goods. Our suppliers support our functions and the services provided to our customers, and consist primarily of IT, professional services



(for example, solicitors or accountants) and mortgage administration services. We have a limited number of suppliers based outside the UK and none in high risk jurisdictions. For these reasons, we consider the risk of the presence of modern slavery or human trafficking within our supply chains to be low but ensure this is considered as part of our supplier due diligence process and continue to monitor this regularly.

As part of our ongoing commitment to continuous improvement of supplier related processes, we have enhanced our due diligence processes to give specific consideration to the identification and monitoring of modern slavery and human trafficking risks, for example obtaining confirmation that a supplier's employees are paid a living wage or the supplier explains why not for medium or high risk services. During Supplier selection and the due diligence process, our colleagues are asked to consider whether the Supplier has a good reputation, acts in an ethical manner and is socially responsible (consistent with our Values). As part of this process, suppliers are classified according to the risk and value associated with the service.

We expect our suppliers to comply with modern slavery and human trafficking legislation. Our high risk suppliers are asked to provide information on how they prevent modern slavery/human trafficking in their business and their supply chains. KRIs and KPIs have been agreed and are monitored as part of our governance process to ensure compliance with our Outsourcing and Supplier Policy. This is part of the wider Enterprise Risk Management Framework, which operates to identify and mitigate all areas of operational risk.

If we discover that a supplier is involved in modern slavery through due diligence or later, the supplier would not be considered as suitable to partner with and would therefore be excluded from any selection process. Where a supplier is later found to be involved in modern slavery, after contracting for a service, Belmont Green would seek professional advice where necessary regarding the possibility of terminating the service.

We have introduced a Supplier Code of Conduct which sets out our expectation that suppliers comply with modern slavery and human trafficking legislation, regulation and codes. This includes not using forced, involuntary or child labour and complying with working standards conditions. The Supplier Code of Conduct is shared with Vida's highest risk suppliers via relationship management meetings and is also made available on the website.



### **Next steps**

All relevant processes and policies, including in respect of modern slavery and human trafficking risks, will continue to be reviewed and where possible enhanced during the coming year as part of our continuous improvement initiatives. In particular, we will focus on embedding our ESG Policy. We will continue to work to ensure that policies and procedures are effectively embedded in the Company and risks are identified, carefully considered and monitored, and appropriately mitigated or managed.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Belmont Green Finance Limited Slavery and Human Trafficking Statement for the financial year ending 31 December 2022.**

A handwritten signature in black ink, appearing to read "A. Mooney", with a horizontal line extending from the end of the signature.

**Anth Mooney, Belmont Green Finance Limited, 27 June 2023**