

Modern Slavery Act 2015

Hampshire Trust Bank Plc (“HTB”) Modern Slavery Statement for the Financial Year 2018

Introduction

The Board of Hampshire Trust Bank (“HTB”) fully supports the objectives of the Modern Slavery Act 2015 (“MSA”) and is intent on meeting the requirements of the MSA in relation to where HTB might encounter modern day slavery. HTB will not engage in any business activity with a third-party organisation which engages, or is believed to engage in, people trafficking, slavery, forced labour or domestic servitude.

Our Approach

HTB is committed to acting ethically and with integrity in all business relationships and to enforcing effective controls to ensure slavery and human trafficking is not taking place anywhere in HTB’s operations or supply chains.

In order to meet its responsibilities in this area, HTB undertakes due diligence on third party partners and suppliers to ensure that their policies and practices are both compliant with the MSA and are aligned to the values and expectations of HTB. As we continue to grow as an organization, our assurance approach will also evolve to reflect this commitment and measure effectiveness on an ongoing basis.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. Some of which include:

- **Supplier management policy.** We set out clearly for all managers and employees of HTB the expectation that all procurement is done in a way that enables HTB to fulfil its regulatory and legal obligations.
- **Whistleblowing policy.** We encourage all staff to report any concerns related to our activities and those of our suppliers and provide a mechanism in which they can be comfortable and confident to do so. This includes concerns around modern slavery in our business or supply chain.
- **Conduct Risk policy.** HTB is committed to minimising risks to customers and treating all our customers fairly and in a manner that is consistent with the principles and ethos of Treating Customers Fairly (TCF).
- **Fighting financial crime policy.** We provide all employees with information on what financial crime risks HTB may be exposed to, and what responsibilities both HTB and its employees have to manage these risks.

Slavery and Human Trafficking

As used in this Statement, the above term refers to a variety of offences, including but not limited to:

- Slavery, servitude and forced or compulsory labour;
- Sexual exploitation, including all offences contemplated in Part 1 of the UK Sexual Offences Act 2003;
- Removal and trafficking of organs outside the context of authorised health treatments;
- Securing services or other type of benefits by force, threats or deception; and
- Securing services or other type of benefits from children and vulnerable persons.

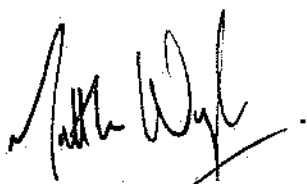
Training

As a financial services provider, HTB does not have a high risk of modern slavery but operates a risk-based approach to review suppliers who may carry a higher risk of modern slavery. To ensure a high level of understanding of the risks of modern slavery and human trafficking in HTB's businesses and supply chains, HTB will provide relevant training to areas of its business where the risk of modern slavery and human trafficking may be discovered or reported. Within the next year, additional compliance training will be developed to enhance knowledge across HTB of the MSA and associated risks.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes HTB's modern slavery and human trafficking statement, as required by the Act, for our financial year ended 31 December 2018.

This statement, which will be reviewed annually and updated as required, has been reviewed by key stakeholders and senior management and has been approved by HTB's Board of Directors.



Matthew Wyles

Chief Executive Officer

20 March 2019