

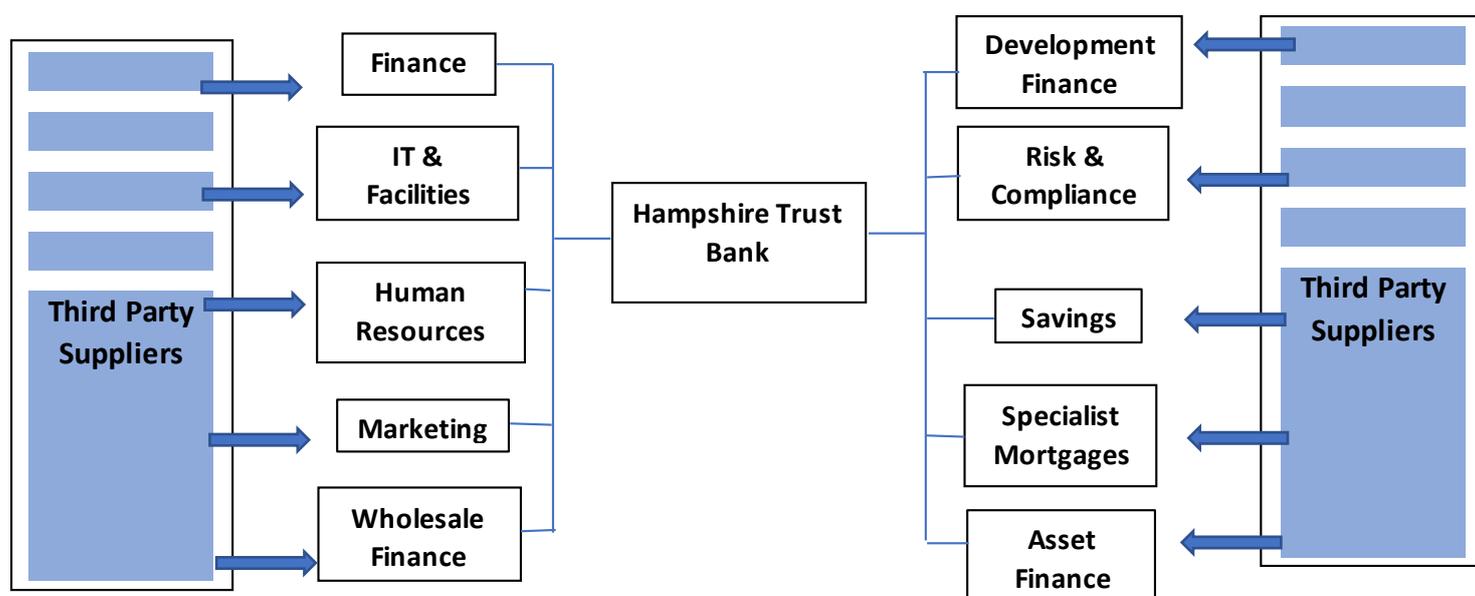
Hampshire Trust Bank Plc (“HTB”) Modern Slavery Statement for the Financial Year 2021

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 take all necessary steps to ensure that it does 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.

Entity Chart: Corporate Structure, Business and Supply chains

HTB largely uses people employed directly by HTB, and our people policies ensure fair treatment of all staff and third party contractors.



Our Approach

As a financial services provider, HTB does not have a high risk of modern slavery, and our external suppliers are mostly UK based companies in low risk sectors. However, HTB operates a risk-based approach to review third party suppliers who may carry a higher risk of modern slavery. 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.

Our HTB People Values of Integrity without compromise, Customers Matter, We Deliver and People Power, are the foundations of our culture and underpin how HTB conducts business. They outline the expectation of our people’s behavior in all interactions.

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 Modern Slavery Act and are aligned to the values and expectations of HTB. These measures as listed below:

- All suppliers are required to confirm that they have a modern slavery policy that is compliant with regulations, and that they comply with that policy.

Furthermore, other policies that are used when HTB engages with third parties include Health and Safety and Data Protection policies. These policies are owned by the relevant managers, however procurement require suppliers to confirm they have policies that are compliant with each regulation. As we continue to grow as an organization, our assurance approach will 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

To ensure a high level of understanding of the risks of modern slavery and human trafficking in HTB's businesses and supply chains, HTB provides relevant training to all employees on the areas of its business where the risk of modern slavery and human trafficking may be discovered or reported to increase education and awareness. This training is assigned to all employees of HTB on an annual basis, via our Learning Management System. Completion of the training is required as part of

mandatory compliance training. HTB employees can re-visit training modules at any time by accessing their Learning Management Platform profile.

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 2022.

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.