

Modern Slavery Statement

As required by the Modern Slavery Act 2015, this statement describes the approach of – and steps taken by – Funding Circle Ltd and its UK-based affiliates during the financial year ending on 31 December 2020 in relation to the detection and prevention of slavery and human trafficking in our own business and supply chain.

Modern Slavery Statement

We have a zero tolerance approach to modern slavery and human trafficking and we are committed to ensuring that our business operates in a socially responsible way. We are committed to playing our part in helping the world to improve practices designed to combat slavery and human trafficking.

Our Culture

In line with our ambition to build a better financial world, we strive to act with integrity at all times and to conduct our business in a fair and transparent manner.

We conduct our business at all times in accordance with certain guiding principles which represent the high standards that we set ourselves and exemplify the ethos and values which we seek to inculcate in all of our employees. These include “Being Open” (where we recognise the importance of transparency, treating people well and honesty) and “Think Smart” (where we encourage the asking of questions and positive challenge). We assess employee performance against these principles.

Our Employees

We employ people from a diverse range of backgrounds who all share, and subscribe to, the ambitions and values of our business. All our employees undertake a learning and development programme which includes ongoing training in relation to:

- the regulatory environment in which we conduct our business; and
- the policies, practices and professional standards we adopt.

Where applicable to an employee’s role, procurement training is provided which addresses (among other things) the issues of modern slavery and human trafficking.

The maintenance of exemplary professional and ethical standards is extremely important to us and the way in which we conduct our business, and employees are aware of the possibility of sanction in the event of contraventions of, or non-compliance with, them. Our People Team is trained to deal with concerns raised by or about our employees lawfully, promptly and confidentially.

Our Policies, Processes and Procedures

We are committed to act with integrity in all of our business activities and to comply with all applicable laws and regulations to which we are subject. Our relevant policies include those relating to:

- anti-money laundering and counter-terrorist financing;
- conflicts of interest;
- anti-bribery and corruption;
- whistleblowing;
- the protection of data and data confidentiality; and
- procurement.

In addition, we have developed standards, processes and procedures including:

- the monitoring and review of the effectiveness of our internal policies and their implementation;
- ongoing supplier risk/impact assessments and due diligence on proposed and existing service providers to mitigate the risk of slavery and human trafficking occurring in our supply chains;
- those to support an inclusive, open and tolerant workplace environment; and
- those relating to the raising of concerns or poor practice by our employees and those with whom we deal.

These policies, processes and procedures are regularly reviewed to ensure they are fit for purpose and, where relevant, compliant with the latest modern slavery guidelines.

Our Supply Chain

Our supply chain service partners principally involve suppliers of technology, data, office and facilities supplies, and professional advisory firms, amongst others. We undertake detailed due diligence on proposed suppliers to ensure that they are a suitable organisation with which to do business, which includes:

- Assessing the selection, management and geographical location of their employees;
- The selection and management of their sub-contractors and their supply chain
- Their commitment to corporate social responsibility.

We are committed to acting ethically in all our business relationships and implementing and enforcing effective systems and controls which make it clear that we do not tolerate slavery and/or human trafficking within our supply chains and would seek to terminate any relationship with a supplier where evidence of the same occurred.

Given the nature of our business, we do not consider that we operate in a sector where modern slavery and human trafficking are particularly prevalent or of high risk, however a small proportion

of our service providers have business operations within geographical locations that do represent an elevated risk. In 2019 we strengthened our supplier assurance programmes to ensure that our supply chain services partners comply with, and are aligned to, our values and our commitment to ensure that there is no slavery or human trafficking arising in our supply chains or in any part of our business and are assessed on this basis during the procurement process. In 2020 we continued the progress of the previous year by revisiting and completing retrospective supplier assurance on our pre-existing material, critical or significant suppliers (as categorised in our supplier risk framework). A Supplier Risk Forum now meets quarterly to ensure that our risks are correctly prioritised and our actions are targeted to address these risks for maximum impact.

We have not, to date, had any reportable incidents of non-compliance with our Statement since first published.



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Lisa Jacobs, Director

8 April, 2021