

# SLAVERY AND HUMAN TRAFFICKING STATEMENT (THE 'STATEMENT') 2025



This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes the Kensington Mortgage Company Limited ("KMC" or "Kensington") slavery and human trafficking statement for the financial year ending 31 December 2024.

KMC is a wholly owned subsidiary of Barclays Bank UK PLC.

Kensington Mortgage Company is committed to ethical working practices and operates a zero-tolerance policy towards modern slavery and human trafficking. We are committed to combating modern slavery in all its forms, ensuring that our internal practices and our supply chain and third-party relationships uphold the highest ethical standards and human rights protections.

## Our Business and Group Structure

- The principal business activity of KMC is the provision of a range of residential and buy-to-let mortgage loans and mortgage servicing solutions in the UK.
- KMC's business is within the financial services sector and we are authorised and regulated by the Financial Conduct Authority in the UK (FCA Register No. 310336).
- KMC is a wholly owned subsidiary of Barclays Bank UK PLC. KMC's ultimate parent is Barclays Bank PLC. Barclays Bank UK PLC is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

## Our Suppliers and Supply Chains

- KMC has approximately 400 suppliers located predominantly in the UK rendering a range of services which are mainly professional and technical.
- KMC principally utilises highly skilled specialist technical resources. The majority of the suppliers of these services reside within the UK (as opposed to offshore locations), therefore they present a lower inherent risk of modern slavery including worker exploitation and human trafficking.

## Our policies on Slavery and Human Trafficking

- KMC's Vulnerable Customer and HR Policies address modern slavery, demonstrating a commitment to conducting business ethically.
- KMC's Procurement and Supplier Management policy requires that all new suppliers are assessed on their compliance with the Act.
- KMC recognises a need to regularly review and improve processes to remain compliant with the Act.

## Controls over adherence to the Modern Slavery Act

As part of our initiative to identify and mitigate modern slavery risk, we have continued to:

- Carry out vetting procedures on all our new service suppliers prior to on-boarding and executing services on our behalf.
- Review existing suppliers with the aim of assessing whether there is any modern slavery risk exposure to KMC based on our suppliers' geographical location and product or services rendered.

## Training

- We are committed to continuing to raise modern slavery awareness within KMC in order to help our staff understand what modern slavery is, its adverse effects on people's lives and how they can help us minimise the risks.
- KMC's organisation-wide modern slavery eLearning is available to all relevant employees. Additionally, processes are in place to ensure that relevant employees continue to undertake the eLearning on an annual basis and new employees complete KMC's training suite of eLearning modules including modern slavery within a specified time period.
- We want our employees to be able to recognise instances of modern slavery if they come across them, be it inside KMC or our supply chains, by spotting some of the common signs of modern slavery.
- We want our employees to be able to report any suspicions they may have without recrimination and, where desired, in confidence using our whistleblowing procedures.
- Employees have also been provided with the external contact details of the Government Modern Slavery Helpline (0800 0121700).

## Further steps

We continue to take steps to maintain awareness of modern slavery within our organisation and supply chain and monitor the effectiveness of our controls for 2025, these include:

- Continuing to identify key risk exposures in the supply chain.
- Continuing to evolve slavery and human trafficking supplier oversight and monitoring.

## Mark Arnold

CEO

For and on behalf of Kensington Mortgage Company Limited

Date January 2025