

# SLAVERY AND HUMAN TRAFFICKING STATEMENT (THE 'STATEMENT') 2022/23



This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes The Kensington Group's slavery and human trafficking statement for the financial year ending 31 March 2022.

The Statement applies to Kensington Mortgage Company Limited ("KMC" or "Kensington"). KMC is a wholly owned subsidiary of Kensington Holdco Limited ("KHL") (KMC and KHL together, the "Group").

## 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. KHL's role in the Group is that of mortgage purchaser and investor.
- Our business is within the financial services sector and we are authorised and regulated by the Financial Conduct Authority in the UK (KMC - FCA Register No. 310336).
- KMC's ultimate parents are funds controlled by Blackstone Tactical Opportunities Advisors LLC and Sixth Street Partners LLC, both headquartered in the United States of America.
- KMC's turnover for the year ending 31 March 2021 was £65,929,000.

## Our Suppliers and Supply Chains

- The Group has approximately 400 suppliers located predominantly in the UK and spread across various sectors including, but not limited to, insurance, IT and consultancy firms.
- The Group principally utilises highly skilled and specialist technical resources and services and because the majority of the suppliers of these services tend to sit onshore within the UK (as opposed to offshore locations), we believe, helps present a lower inherent risk of worker exploitation or human trafficking.
- Despite what the Group perceives to be a low inherent risk, the Group is committed to ensuring that all those in its supply chain adhere to its policies governing modern slavery and human trafficking.

## Our policies on Slavery and Human Trafficking

- The Group's Procurement Policy emphasises the Group's commitment to use best endeavours to ensure that there is no modern slavery or human trafficking taking place in any part of its business or that of its supply chain.
- As part of the new supplier on-boarding process, all new suppliers are assessed on their compliance with the Act.
- All new supplier contracts and those that came up for renewal during the period, where applicable, included wording designed to reiterate the Group's stance on slavery. In addition, we communicated more with our suppliers to ensure that the suppliers understood our rationale for incorporating such clauses within our contracts. We will continue to do so going forward.
- We recognise that process improvement both internally and externally is ongoing. Therefore, we will continue to work closely with our suppliers to ensure all businesses are conducted in an ethical and transparent manner.

## Group 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 enhanced vetting procedures on all our new service suppliers prior to on-boarding and executing services on our behalf.
- Identify and assess potential risk areas in our supply chains which are monitored (and then mitigated) on a risk based approach i.e. the riskier the service (as identified during on-boarding), the greater the level of oversight exercised over that supplier.
- Review existing suppliers with the aim of assessing whether there is any modern slavery risk exposure to the Group based on our suppliers' geographical location, turnover and product or services rendered.

## Training

- We are committed to continuing to raise modern slavery awareness within the Group 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.
- The Group's organisation-wide modern slavery eLearning is available to all relevant employees. Additionally, processes are in place to ensure that existing relevant employees continue to undertake the eLearning on an annual basis and new employees complete the Group's training suite of eLearning modules (which include the modern slavery module) 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 our Group or 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 effectiveness of our controls for 2022/23, these include:

- Ongoing review and development of key performance indicators to assess the effectiveness of the antislavery policies and procedures.
- Continuing to identify key risk exposures along the supply chain and put in place appropriate controls.
- Continuing to provide slavery and human trafficking supplier oversight and monitor its effectiveness utilising a risk-based approach that follows through from the initial on-boarding process through to service exit.

## Alexander Filshie

CFO

For and on behalf of the Kensington Mortgage Company

Date March 2022