

MODERN SLAVERY ACT STATEMENT 2018



1. Introduction

Bibby Financial Services (BFS) is an independent financial services partner to over 10,500 businesses worldwide.

We are committed to conducting business in a sustainable and responsible manner. Our corporate values and company policies promote ethical business practices. We have a zero tolerance of slavery, servitude and forced or compulsory labour and human trafficking.

We pay the minimum wage, at least, to all eligible employees and comply with country laws governing labour standards wherever we do business.

We are committed to our values and Corporate Social Responsibility and Corporate Ethics policies. We require the same high standards from our suppliers, contractors and other business partners.

2. Our business structure

With more than 1,300 employees globally, BFS has operations across Europe, Asia and North America. We operate in the following countries:

- Canada
- Belgium
- Czech Republic
- France
- Germany
- Hong Kong
- Malaysia
- The Netherlands
- Poland
- Republic of Ireland
- Singapore
- Slovakia
- United Kingdom
- United States of America

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We provide a range of financial services, including Invoice Finance, Asset Finance, Foreign Exchange and Insurance services, to businesses in more than 300 industry sectors worldwide.

BFS is supported and fully owned by the Bibby Line Group. The Bibby Line Group is a family business, with a 200 year heritage. It is one of the longest established businesses in the United Kingdom.

This statement is for Bibby Financial Services Limited, which includes its subsidiaries Bibby FS (Holdings) Limited, Bibby Financial Services (UK) Limited, Bibby Financial Services (Europe) Limited and Bibby Invoice Finance UK Limited.

3. Supply chains

We procure a wide range of services and products around the world. These include facilities management, maintenance and cleaning, recycling, office equipment and supplies, utilities, marketing, communications, IT software and hardware, recruitment, temporary staffing, management consultancy, and training.

We require all of our suppliers to comply with national and local, relevant law and regulations.

We will not work with any organisation that has been or is found to be knowingly involved in modern slavery. We have the right to audit our supply contacts and will fully investigate where concerns are raised.

We understand that our biggest exposure to modern slavery is through our client-base. While separate to our supply-chain, in 2019 we will review our processes to enhance understanding of our clients' policies with regard to modern slavery.

4. Governance

Our Corporate Ethics, Anti-Money Laundering, Health and Safety, Corporate Social Responsibility and Whistleblowing policies support our commitment to acting ethically and with integrity in our own business.

They also drive the implementation and enforcement of effective systems and controls to ensure that slavery and human trafficking does not take place anywhere in our supply chains.

5. Due diligence and risk assessment

We recognise that our influence extends beyond our own operations to clients, local communities and supply chains.

Our suppliers are procured directly with the oversight of our Risk and Assurance teams and an appropriately authorised Accountable Executive in accordance with our documented procurement procedure.

Suppliers must provide information about their anti-bribery, money laundering and other financial crime controls, code of conduct and similar policies, approach to equality, inclusion and diversity, health and safety and practices relating to the environment.

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With the introduction of the Modern Slavery Act 2015, they must also attest that they are not knowingly involved in modern slavery.

In 2018, we conducted an updated risk assessment on all aspects of financial crime, including modern slavery. As a result of this assessment we introduced modern slavery to our financial crime training programme.

In 2019, as one of the key potential areas of our exposure, we will place greater due diligence focus on our construction finance proposition, while continuing to keep a risk-based approach to individual industry sectors. Specific measures include leveraging training and guidance from trade body, UK Finance, on labour exploitation in vulnerable industries, in addition to developing company-specific training for our Money Laundering Regulation Officers.

6. Measurement and reporting

Employees are encouraged to raise any concerns that they may have either to their manager, another manager or through one of the formal channels that we have available.

We have a global Whistleblowing Policy and externally hosted whistleblowing hotline, where employees are able to raise concerns. We also have a risk incident reporting tool available to all employees globally.

We monitor and report progress using a number of indicators to evaluate the effectiveness of our Corporate Ethics and Corporate Social Responsibility programmes. The metrics we report include:

- Colleague engagement and satisfaction.
- Completion rates of mandatory employee compliance training, including Corporate Ethics and Anti-Money Laundering.
- The number of whistleblowing incidents.

7. Communication and training

We respect and support the human rights of our employees, contractors and business partners. Colleagues have access to our Corporate Ethics and Whistleblowing policies and are encouraged to raise any concerns about their treatment by the company, or individual colleagues, in confidence and without fear.

In 2018, we continued to emphasise our commitment to conducting business in responsible manner. We developed a new section of our mandatory corporate ethics training and e-learning programmes to help colleagues identify signs of modern slavery and human trafficking, either in our supply chains or amongst our client-base. The new section features guidance on recognising the signs of different forms of human trafficking such as sexual exploitation, forced labour, domestic servitude and criminal exploitation. It also includes case studies to educate colleagues about how to identify behavioural indicators and physical symptoms of modern slavery and human trafficking.

In 2018, 85% of BFS UK employees completed training focusing on modern slavery and human trafficking. We are targeting a 100% completion rate in 2019, in addition to extending this mandatory training module to all employees globally.

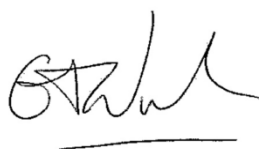
Furthermore, we expanded our Corporate Social Responsibility policy to provide further clarity surrounding modern slavery.

While we acknowledge that there is more we can do, we have specific plans to progress this further in 2019. Specifically, we will provide dedicated training and support for our Money Laundering Regulation Officers, and as part of our ongoing Financial Crime Compliance and Anti-Money Laundering training programmes.

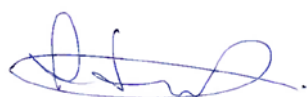
We and the Global Chief Executive, the Head of Learning and Development and the Head of Corporate Communications ensure that all employees, contractors and relevant Business Partners are informed about, understand, and support our values and policies.

We will continue to provide the necessary resources and investment to ensure that our company policies and procedures are up to date, relevant and understood.


This statement is approved by the Board of Directors of Bibby Financial Services Limited, Bibby FS (Holdings) Limited, Bibby Financial Services (UK) Limited, Bibby Financial Services (Europe) Limited and Bibby Invoice Finance UK Limited.



**Edward Winterton, UK Chief Executive Officer and Director
Bibby Financial Services Limited, Bibby FS (Holdings) Limited, Bibby Financial Services (UK) Limited**



**Richard Carter, Chief Executive Officer and Director
Bibby Financial Services (Europe) Limited**



**Ian Ramsden, Global Risk Director and Director
Bibby Invoice Finance UK Limited**

September 2019

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