

MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2022

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (“the Act”) and sets out the steps that Leeds Building Society together with its subsidiary and associated companies have taken in 2022 to provide us with reasonable assurance that slavery and human trafficking are not taking place in its supply chains or any parts of its business.

Who we are and what we do

Leeds Building Society (“the Society”) is the UK’s fifth largest building society, we are a proud mutual, owned by our members, the people who have mortgages and savings with us. We have a wide and award-winning range of savings and mortgages, whether you’re just starting out or heading into retirement, we’re here to help. The Society’s trading subsidiary and associated companies are Leeds Mortgage Funding Limited and Leeds Building Society Covered Bonds LLP.

The Society is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Our purpose is to put home ownership within reach of more people generation after generation. We provide our services through the Society’s national branch network, online and member contact centres, as well as through our intermediary network in relation to home finance products.

Our Supply Chain

The Society’s supply chain includes circa 500 suppliers of goods and services that we buy from the external market including professional services (such as conveyancing services), office consumables, corporate clothing and IT software. The regulated nature of financial services means that we operate within a low-risk industry for modern day slavery, we do however remain vigilant and take our responsibilities under the Act seriously.

Our Policies and Processes

Within the Society, ethical and compliant behaviour sits at the heart of what we do. We have implemented a variety of policies & processes including a Third Party Management Policy that requires all colleagues to act ethically and with integrity in all of their third party supplier relationships. Underpinning this policy we have a set of standards including our On-boarding & Due Diligence Standard, Contracting Standard & Third Party Management Standard. The policy and standards are updated on a periodic basis and were last reviewed and updated in September 2022. We take a risk-based approach when monitoring our procurement activity and place particular focus on industries that carry a higher risk of modern day slavery.

Third Party Management training for colleagues is in place with a specific focus on due diligence and third party management responsibilities. This training includes content to ensure that colleagues are able to assess supplier compliance with the Act on an annual basis during the lifetime of the relationship.

Additionally, colleagues across the Society are advised by our Third Party Management team on a case-by-case basis on approaches to due diligence at the point of entry into supplier arrangements. Each approach is appropriate and proportionate to the risks involved in individual procurement exercises.

To further enhance our due diligence processes, in 2022 we launched a sustainability due diligence tool which specifically focusses on sustainable procurement and labour and human rights. We now have a process in place for enhanced screening of all our third party suppliers that present a higher risk to Modern Slavery.

Oversight and governance is provided by our Operational Resilience Committee and operational areas are expected to attest against controls on at least an annual basis under the Risk Management Framework.

Modern Slavery clauses are included in the Society's standard supplier agreements. When contracting on a supplier's standard terms the Society looks to ensure requisite modern slavery provisions are included.

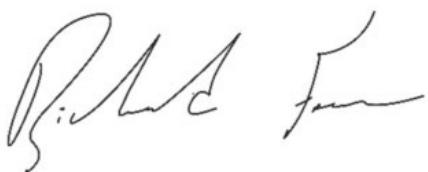
Our Compliance with Policy Standards

The Society employs over 1,627 colleagues throughout our business, and all are vetted and referenced before they begin work. All receive regular training on our business values, which include matters relating to financial crime and public interest disclosures in accordance with our Speak Up Policy and processes. In 2021, the Society maintained its accreditation as a Living Wage employer by the Living Wage Foundation. As part of our commitment to Fair Reward, we have paid at least the real Living Wage to all colleagues since 2014. As part of our on-boarding and due diligence processes we undertake checks to provide us with assurance that suppliers are also paid the real Living Wage.

We formally recognise the Leeds Building Society Colleague Association as the only independent trade union available to colleagues for the purposes of consultation on the terms and conditions of employment at the Society.

The Society remains committed to doing all that it reasonably can to contribute toward helping eradicate modern slavery and human trafficking and will keep policies and procedures under review in 2023.

This statement was approved by our Board on 23/03/2023 and is signed on behalf of the Board by Richard Fearon, Chief Executive Officer.

A handwritten signature in black ink, appearing to read 'Richard Fearon', is positioned below the text of the statement.