

# Modern Slavery Act 2015 Statement



## DF Capital Bank Limited Slavery and Human Trafficking statement for the financial year ending 31 December 2023

DF Capital takes a zero tolerance approach to slavery and human trafficking. It continues to be a priority for DF Capital to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we have undertaken to combat modern slavery in our organisation and supply chain.

### 1. DF Capital's organisation structure and supply chains

DF Capital is a trading name of DF Capital Bank Limited, which is a subsidiary of Distribution Finance Capital Holdings plc and is registered in England and Wales. DF Capital is a specialist personal savings and commercial lending bank. DF Capital Bank Limited is authorised and regulated by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA).

We source our materials and services from a range of suppliers, including those who operate internationally. We expect our suppliers to have the same high standards as we do in regard to their due diligence within their supply chain to ensure the Modern Slavery Act is upheld.

### 2. Policies in relation to slavery and human trafficking

We have a number of policies in place which support our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We regularly review and update all our policies.

#### Whistleblowing Policy

Our whistleblowing policy ensures anyone who has a concern within the business is able to raise it without any risk of negative repercussions. We take whistleblowing seriously and take every step to investigate and take action where necessary.

#### Code of Ethics Policy

The Code of Ethics defines our values (our brand values) in greater detail and provides structure and guidance for decision making. It is consistent with and complements the regulations and control environment under which we operate.

#### Outsourcing and Third Party Risk Policy

This Outsourcing and Third Party Risk Policy describes the high-level principles that must be adhered to for all outsourcing and third party risk management activities to control both external expenditure, maintain operational resilience and limit legal exposure. The policy details how we are committed to adhering to all modern slavery laws and regulations, particularly in our procurement and supplier selection.

#### Employee handbook

DF Capital's Employee Handbook lays out the company's approach to employee related matters and how they should be approached, specifically within our recruitment approach and employee training.

### 3. Due diligence processes and risk management

Our suppliers go through a due diligence process during their on-boarding in order for us to identify and assess potential risk areas in our supply chains and to mitigate the risk of modern slavery and human trafficking occurring. Where applicable, we require all of our suppliers to have in place their own anti-slavery statement, and we expect them to carry out their own due diligence when taking on board their own suppliers. These relationships are reviewed on a regular basis to address any relevant changes.

The risk of slavery and human trafficking in our supply chain is low. Our risk team has oversight throughout our on-boarding process to ensure all suppliers are conforming to the Modern Slavery Act.

### 4. Training

To ensure a high level of understanding of the risk of modern slavery and human trafficking in our supply chains and our business, training is mandatory for all our new and existing colleagues.

### 5. Our on-going commitment

DF Capital will continue to review and enhance our processes and policies to ensure we remain diligent in our commitment to tackling Modern Slavery throughout our supply chain. Since the first publication of this statement, all staff, new and existing, at DF Capital receive mandatory training on Modern Slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2023. It was approved by DF Capital's Board on 27 April 2024 and will be reviewed on an annual basis. This statement was signed by our Independent Board Chair on 27 April 2024.



**Mark Stephens**  
Independent Board Chair