**This statement is made on behalf of Belmont Green Finance Limited trading as Vida Homeloans (referred to as “Belmont Green” or “the Company”) pursuant to section 54 of the Modern Slavery Act 2015.**

This statement was approved by Anth Mooney, CEO, following the filing of the Company’s annual accounts, and approved by the Board of Directors at its Board meeting on 26 May 2022.

Belmont Green Finance Limited is registered in England and Wales, with the registered number 09837692 and registered office at 1 Bridge Street, Staines-upon-Thames, Surrey, TW18 4TW. Vida Homeloans is a trading style of Belmont Green Finance Limited.

This statement sets out the steps taken to ensure that slavery and human trafficking is not taking place in our business or supply chains.

**Belmont Green’s Business and Structure**

Belmont Green is a specialist lender based in the United Kingdom. The Company provides mortgages to customers who may fall outside the criteria of mainstream lenders. Belmont Green’s products are designed to be prudent, cautious and deliver good customer outcomes and are distributed under the “Vida” brand.

Belmont Green was established in 2015 and as at the date of its 2021 Annual Report and Accounts, had assets of £2billion and an annual equivalent turnover of c. £69million. It has 9,500 customers and employs over 190 staff.

 **Policies and Values**

Belmont Green has zero tolerance to slavery and human trafficking. We and our people are committed to acting ethically and with integrity in all business relationships and to implementing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the organisation or in our supply chains. Our Values reflect this – we are dynamic and cut through complexity to ensure we do not accept second best; and we are authentic, honest and genuine.

As part of ongoing initiatives to identify and mitigate risk, we have in place effective systems and policies to ensure that we:

* identify and assess potential risk areas in our business and supply chain;
* monitor potential risk areas and mitigate the risk of modern slavery or human trafficking taking place in our business or supply chain;
* protect against funds containing proceeds of crime obtained through modern slavery or human trafficking entering our business through strict money laundering safeguards; and
* protect whistleblowers.

In relation to the properties on which we lend, we have specific lending conditions in place to ensure that houses of multiple occupancy are appropriately licensed and that every property has a physical valuation where any concerns relating to multiple tenants or living standards are flagged and conditions imposed. Where we become aware of modern slavery or human trafficking violations relating to a property on which we have lent, we will take appropriate action and support the authorities in any investigation.

In addition, we have policies and procedures in place to ensure robust due diligence is carried out on suppliers, supplier relationship management is carried out in accordance with level of risk, and all relevant legislation and regulation is adhered to.

A number of other policies and procedures in the organisation also support the management of modern slavery and human trafficking risk, including our Whistleblowing Policy, Compliance policies on AML, Fraud, Financial Crime and Anti-Bribery and Corruption and the Risk Management Framework.

Due to the nature of our business, the COVID-19 pandemic has not significantly increased the risk of exposure to modern slavery and human trafficking either within the business or in the businesses of our suppliers, however this situation will continue to be monitored and priorities will change if required.

**Colleagues and Training**

The Company demonstrates respect for human rights and has a zero tolerance of modern slavery throughout the organisation.

The health and safety of colleagues and suppliers throughout the COVID-19 pandemic, and subsequently, has been forefront of mind for the management team at Belmont Green. We have undertaken regular updates to, and monitoring of, health and safety guidance and policies and review of working from home practices, including through colleague surveys and health and safety assessments. An Agile Working Policy has been approved and implemented to support colleagues. Support for mental health and physical wellbeing has included training for managers to understand how to recognise potential wellbeing issues, and a number of events to raise awareness, including stress awareness month. We are currently in the process of training mental health first aiders to provide further support to colleagues.

Belmont Green’s Whistleblowing Policy ensures employees can raise any concerns effectively, including those relating to modern slavery and human trafficking. All concerns are investigated, and individuals can escalate to senior management where appropriate. Employees may elect to remain anonymous, and every effort is taken to ensure their identity remains confidential.

We provide all staff with training, relevant to them and their role, including offering specific online training on modern slavery and human trafficking in financial services, which emphasises the role of the financial services industry in combatting this, explains the different types of modern slavery, and gives detail on possible ‘red flag’ indicators. Colleagues are provided with a short guide covering these areas, which is published on our intranet and available to review at any time. We are also committed to delivering effective training to those colleagues who deal with suppliers as part of their role.

**Supply Chain Risks**

Belmont Green does not manufacture or supply any goods. Our suppliers support our functions and the services provided to our customers, and consist primarily of IT, professional services (for example, solicitors or accountants) or other services providers (for example, mortgage administration). We have a limited number of suppliers which are outside the UK and none in high risk jurisdictions. For these reasons, we consider the risk of the presence of slavery or human trafficking within our supply chains to be low, but continue to monitor this regularly.

As part of our ongoing commitment to continuous improvement of supplier related processes, we have enhanced our due diligence processes relating to the identification and monitoring of modern slavery and human trafficking risks. Our supplier onboarding process gives particular consideration to identifying risks of modern slavery and human trafficking within our supply chain. During Supplier selection and the due diligence process, we consider whether the Supplier has a good reputation, acts in an ethical manner and is socially responsible (consistent with our Values). As part of this process, suppliers are classified according to the risk and value associated with the service.

All medium and high risk suppliers are required to confirm compliance with modern slavery and human trafficking legislation and to payment of the National Living Wage (or explain why not, if that is the case). Our high risk suppliers are asked how they prevent modern slavery/human trafficking in their business and supply chains. Contracts are also reviewed for requirements to comply with legislation/regulation. KRIs and KPIs have been agreed and are monitored as part of our governance process to ensure compliance with our Outsourcing and Supplier Policy. This is part of the wider Belmont Green Risk Management Framework, which is designed and operates to identify and mitigate all areas of risk, both internally and through our supply chains.

Where Belmont Green discovers that a supplier is involved in modern slavery through due diligence, the supplier would not be considered as suitable to partner with and would therefore be excluded from any selection process. Where a supplier is later found to be involved in modern slavery, after contracting for a service, Belmont Green would terminate the service, seeking professional advice where necessary.

**Next steps**

All relevant processes and policies, including in respect of modern slavery and human trafficking, will continue to be reviewed and enhanced during the coming year as part of our continuous improvement initiatives. In particular, our HR policies will be reviewed with a focus on how they relate to modern slavery and human trafficking.

We will continue to work to ensure that policies and procedures are effectively embedded in the Company and any risks are identified, carefully considered and monitored, and appropriately mitigated or managed. We regularly review our approach to tackling modern slavery and human trafficking.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Belmont Green Finance Limited Slavery and Human Trafficking Statement for the financial year ending 31 December 2021.**

**Anth Mooney, Belmont Green Finance Limited, 26 May 2022**