



# Modern Slavery Statement

2023



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# Introduction

At TSB, we're committed to preventing modern slavery and human trafficking in our corporate activities. We expect everybody in TSB, including our suppliers, to treat others fairly, with dignity and respect. This statement outlines the steps we're taking to understand associated risks related to our business and our supply chains and relates to the financial year January to December 2023.



# Our business

TSB is a retail bank with a trusted customer brand, heritage stretching back to the start of the savings bank movement 200 years ago, and a committed workforce that offer full-service banking to more than five million customers. We serve our customers through digital channels, over the phone and in branches across the UK. TSB is part of the Spanish banking group Sabadell.

In July 2022 we refreshed the Do What Matters Plan - our responsible business strategy, which shapes our business decisions in relation to our customers; colleagues; suppliers; communities; and the environment. The updated plan ensures that TSB will play a full part in encouraging financial inclusion, tackling climate change, supporting small businesses to thrive, and championing diversity and inclusion. The framework sets out how we deliver our purpose of Money Confidence. For everyone. Every day. It also contributes to delivering against international and national targets.

We're signatories to the UN Global Compact corporate responsibility initiative and its principles on human rights, labour, the environment and anti-corruption. We're also accredited by the Good Business Charter, a national accreditation scheme acknowledging businesses that behave responsibly.

Our Treasury function only transacts with regulated financial services firms from highly developed financial markets with strong regulatory regimes (EU & North America).

Our TSB behaviours of 'feel what customers feel; look for better; say it straight; and do what matters', guide our colleagues to deliver our money confidence purpose and comply with regulatory conduct requirements.



# Our colleagues

At TSB, we proactively focus on creating an inclusive culture where everyone can thrive. We believe everyone has a right to work in a safe and supportive environment, where all colleagues act responsibly and are encouraged to raise concerns when they think something's wrong.

All colleagues and temporary workers are taken through pre-employment vetting checks, which includes making sure they have the right to work in the UK. All colleagues are provided with a range of training programmes focused on how we get things done, how we work together and how we behave with customers.

Our colleagues receive a comprehensive total reward package, including a discretionary annual variable pay award; a defined contribution pension scheme, with employer contributions of up to 13% base salary; Private Medical Benefit and a Flexible Benefits scheme. As an accredited Living Wage employer, everyone at TSB is paid at least the real Living Wage.

We involve our colleagues and their representatives in decisions that affect them:

- Our union recognition agreement with Accord and Unite includes guidelines for how we negotiate and consult with them. 98% of colleagues are included within the bargaining unit.
- 'The Link', a forum consisting of a diverse group of colleagues, provides regular feedback to our Executive Committee to influence our strategic activities and meet with our Board at least annually.
- Colleagues are invited to complete regular surveys and tell us what they think about working at TSB.

We provide our customer facing colleagues with guidance on how to spot modern slavery and support affected customers. We require all TSB colleagues to complete ongoing mandatory core learning on anti-money laundering and underlying financial crimes including modern slavery, and in some cases enhanced training on these topics, where relevant to their role.



## In 2023:

We continued to listen to our colleagues through surveys, our Link group and Executive open forums.

87% of colleagues responded to our annual Colleague Experience Survey:

- 95% said they would feel able to raise a concern internally if a colleague was doing something wrong which affects other colleagues, customers or the bank.
- 95% said they understood TSB's approach to the treatment of vulnerable customers.

We embedded TSB's Leadership Expectations across our people leadership platform through targeted development campaigns.

We identified Equity Accelerators from across the TSB leadership population as an active network of allies and sponsors.

Implemented an Emergency Flee Fund of up to £500, for colleagues who are victims of domestic abuse.

## Colleague training included:

- TSB's Core Learning on Criminal Activity Awareness and Prevention – completed by 97% of TSB colleagues.
- Specialised training on modern slavery and human trafficking - this was updated and launched to 2,500 colleagues in October.
- Enhanced training on anti-money laundering, counter terrorist financing and sanctions – this was refreshed and launched to over 2,600 colleagues in November.
- An Economic Crime guide which included updates on detecting modern slavery and human trafficking - this was launched to over 120 senior managers in December.
- Six awareness sessions on Modern Slavery and Human Trafficking during 2023, including:
  - A learning session to all of TSB's Risk function colleagues.
  - An online presentation to all Branch colleagues.
  - Four awareness sessions in conjunction with Law Enforcement, targeted at areas where intelligence indicates modern slavery is more prevalent.
- Training for all colleagues on their responsibilities in acting to deliver good outcomes for customers.
- Targeted training to hiring managers on inclusive behaviours.





## In 2024 we will:

- Strengthen input from The Link, our employee advisory forum, by providing more frequent opportunities to influence the design and implementation of initiatives affecting colleagues, customers and communities. The group will present to Board and Exco throughout the year.
- Continue with our leadership development platform providing further opportunity for our leaders to discuss, practice and share their experiences of delivering our leadership expectations.



# Our customers


Our policies reflect the risks we need to manage at all stages of our customer relationships. This includes customer due diligence, customer risk assessment measures, and ongoing monitoring processes. We also work closely with law enforcement and other external agencies to manage these risks more effectively and to understand the red flags that can help identify modern slavery and human trafficking.

Our Economic Crime Risk (ECR) team work proactively to identify potential victims and organised criminals among our customer base using transaction monitoring rules and threat analytics. The ECR team also participate in the Joint Money Laundering Intelligence Taskforce, which provides valuable insight and intelligence.

We recognise that fraud is a crime that directly funds criminal activity and is largely conducted by Organised Crime Groups, including those seeking to engage in modern slavery. TSB is playing a leading role in raising awareness of the fraud risk and helping to stamp it out. In 2019 we launched our Fraud Refund Guarantee (FRG), becoming the first bank to fully reimburse our customers who are innocent victims of fraud. During 2023, we refunded c.97% of authorised fraud claims from customers, compared to an equivalent figure of 62% for other firms (based on latest data published by UK Finance). The FRG helps us collect important data relating to fraudulent activities and allows us to work with the police and regulators to track down those responsible. We're also a founding member of Stop Scams UK – the first cross-sector body designed to drive collaboration in the fight against fraud. In October 2024 new rules come into force across the industry. These rules legally bind all financial institutions to a reimbursement scheme which will see nearly all fraud victims refunded. Due to this TSB will move away from the Fraud Refund Guarantee but will adhere to the new regulations and continue with the work we do preventing fraud and protecting and supporting our customers.







We provide the 'Safe Spaces' initiative across all TSB branches - offering safe spaces and support to victims of domestic abuse (including economic abuse). All branch colleagues have received specialist training to increase their confidence in responding to disclosures of domestic abuse, and can act quickly to offer information, support referrals and police contact as appropriate.

Our Business Banking team regularly review all business customers to assess whether they might be involved in financial crime, including modern slavery or human trafficking (either as a victim or perpetrator). Any concerns are shared with law enforcement agencies.

To support customers who engage with us via our digital channels, we're continually reviewing our systems and controls to prevent and detect modern slavery.

### **In 2023:**

- We offered customers who are victims of domestic abuse an Emergency Flee Fund of up to £500. We also implemented safe spaces online and took part in the "UK says no more" campaign.

### **In 2024 we will:**

Continue to enhance our understanding of, and improve our response to, the prevention of modern slavery by:

- Conducting pro-active trend analysis, data gathering and reporting to support the prevention and early detection of modern slavery.
- Building relationships with external experts and using insights from other organisations to understand best practice.
- Continuing to enhance our fraud and financial crime controls to ensure that we keep up-to-date with changing methods and the latest technology.



# Our supply chain

Through our [Responsible Supplier Charter](#), we publicise our commitment in the areas of ethical business conduct, supply chain, environmental sustainability, human rights and diversity and inclusion. The Charter sets out the expectations we have of our suppliers on human rights and meeting modern slavery requirements, including publishing their own Modern Slavery Statement if applicable.

Our supplier policies illustrate our commitment to preventing modern slavery, and we ensure our suppliers understand and apply our business principles. Checks are carried out at every stage of the supplier relationship to assess risks of modern slavery and through these checks we have identified no instances or indications of modern slavery within our supply chain to date.

Where we consider that new and existing suppliers may be in a higher risk category, a thorough review of their Labour Standards policy and modern slavery statements is completed and, where appropriate, independent auditing of working conditions may be sanctioned. Higher risk categories include:

- overseas suppliers in higher risk locations,
- facilities management providers,
- manufacturing, such as colleague uniforms,
- temporary recruitment firms.

TSB continues to fund the payment of the National Living Wage to employees of our facilities management supplier and monitors other UK based key suppliers to ensure their employees are also paid at this national rate.

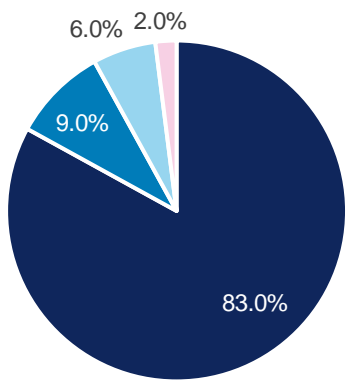


## Reviewing our existing suppliers

Annual due diligence checks are undertaken for higher risk suppliers, including reviewing their statements on their processes and controls against modern slavery.

Our direct, contracted suppliers are predominantly based in the UK and European Union where labour standards laws mean that, for the services we procure, the risk of modern slavery is low.

Geographical split of TSB contracted supplier locations 2023\*



- United Kingdom
- Europe
- North America
- Rest of the World

\* Calculated on where the operations for each contracted TSB supplier are based within the world.

## Assessing new suppliers

Prior to being onboarded by TSB, suppliers are offered the opportunity to sign up to the Hellios Financial Services Qualification System (FSQS). This self-assessment, which requires the supplier to submit policy assurance and compliance data, is refreshed on an annual basis and is reviewed by applicable TSB policy teams. Checks completed using FSQS include corporate and social responsibility practices, labour standards and pre-employment vetting checks. Our standard supplier contracts also include requirements for suppliers to prevent modern slavery in their operations and their supply chain. Our processes make sure new suppliers provide us with evidence that their controls against modern slavery meet the same standards as our own.

## In 2023:

We've continued to develop our understanding of modern slavery and any emerging risks to ensure our checks for existing and new suppliers remain effective.

- Working closely with industry peers, we've enhanced modern slavery due diligence checks performed on our suppliers. A review of all suppliers showed their controls against modern slavery meet our standards, they have a good awareness of the dangers of modern slavery, and no material concerns around their working practices were identified.
- Completed deep-dive reviews on our 9 highest-risk supply chain partners to understand whether there was any increased risk of modern slavery due to their practices, with no adverse findings related to modern slavery or labour standards across these suppliers.
- 72% of TSB suppliers had signed up to FSQS and had either completed the self-assessment questions or were considered exempt.
- We have aligned the TSB Responsible Supplier Charter to the TSB Do What Matters Plan to ensure that we expect the same standards of our suppliers that we expect of ourselves.

## In 2024 we will:

- Invite suppliers that are currently not signed up to Hellios FSQS to do so or request alternative assurance from them should they not wish to sign up. Hellios will be mandated as the default source of all supplier due diligence for suppliers looking to do business with TSB, with any exceptions being agreed with the Head of Procurement.
- Further enhance due diligence checks through Hellios using a new ESG rating tool, which will help identify any areas where our suppliers are scoring poorly for Labour Standards, including Modern Slavery checks and allow us to respond and remediate.
- Complete quarterly deep-dive reviews on our highest-risk supply chain partners to keep up to date with any changes regarding their modern slavery practices.
- Keep the Responsible Supplier Charter updated to ensure that it aligns with any ESG law changes and the TSB Do What Matter Plan.



# TSB policies

Our policies, along with the controls we have in place to adhere to them, set out how we do business. They are a key element in the essentials category of our responsible business plan - Do What Matters 2025.

They include:

- **Anti-Money Laundering & Counter Terrorist Financing policy** – this requires colleagues to report any knowledge or suspicion of financial crime, including modern slavery and human trafficking, to TSB’s Nominated Officer, who assesses the report and decides whether there are grounds to make an onward disclosure to the National Crime Agency.
- **Speak Up and Be Heard- Whistleblowing policy** – encourages colleagues to report any concerns related to TSB activities and those of our suppliers, including suspicion of criminal activity.
- **Vulnerable Customer policy** – includes specific provisions to make sure we take care of vulnerable customers. Colleagues are trained to spot these customers at an early stage and provide appropriate tailored support where they can.
- **TSB Supplier policy** – commits to making sure our suppliers adhere to the highest standards of ethics by asking them to demonstrate that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law.
- **TSB Employment policy** – requires compliance with relevant employment legislation, regulatory requirements, and TSB’s people policies, including the recruitment and vetting of all new hires.



## Board approval

This statement has been approved by  
TSB's Board.



**Nick Prettejohn, Chairman**

Date: 29<sup>th</sup> May 2024





For more information ask us or visit **TSB.co.uk**

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Information correct at June 2024

