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MODERN SLAVERY ACT STATEMENT

Modern Slavery and Human Trafficking Statement made on behalf of Coventry Building Society and its subsidiaries Godiva Mortgages Limited and ITL Mortgages Limited (collectively the "Society") further to section 54 of the Modern Slavery Act 2015

ORGANISATION'S STRUCTURE AND BUSINESS

Coventry Building Society has been looking after our customers' and their finances since 1884, and we are proud to be one of the UK's strongest building societies. The Society is the second largest building society in the UK with assets in excess of £62 billion, serving over 2 million members and employing over 3000 people.

Further details about the Society's financial performance and strategy can be found in our Annual Report and Accounts, which can be found on the external website.

We trade as Coventry Building Society and also have two trading subsidiaries, Godiva Mortgages Limited and ITL Mortgages Limited. We are headquartered in Coventry and all our customer service and head office teams are located in the UK. We are authorised by the Prudential Regulation Authority (PRA) and regulated by both the Financial Conduct Authority (FCA) and the PRA.

During 2023, there were no significant changes to the Society's structure, ownership or capital structure.

We provide competitive savings and mortgage products to members and customers, jobs and career development for employees and social and economic benefits to local communities. We do not have any reliance on seasonal workers and much of our contingent worker population is for professional and senior professional/technical roles.

In 2023, the Society was the first building society in the UK to be awarded the ISO 20400 sustainable procurement standard and the first to achieve B Corp status, a global standard for sustainability. Modern Slavery is incorporated into both of these in relation to the monitoring of supply chain.

THE SOCIETY'S SUPPLY CHAINS

The Society does not manufacture or supply any goods. The Society's suppliers support our functions and the provision of financial services to customers.

The Society's suppliers are subject to screening and due diligence checks before entering into a contract, as well as regular risk assessment and ongoing monitoring of their risk profile.

We have internal procedures to ensure adequate procurement pricing, prompt payment and good planning to ensure that all activities carried out by the Society are in keeping with contractual obligations.

All the Society's call and operations centres are operated by the Society in the UK and the majority of the Society's suppliers are also UK based. Any supplier activity that takes place outside of the UK is expected to comply with all aspects of the Supplier Code of Conduct and is subject to due diligence checks.

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THE SOCIETY'S APPROACH TO SLAVERY AND HUMAN TRAFFICKING

The Society has zero tolerance of slavery and human trafficking both within its own operations and its supply chains. The Society is committed to taking all reasonable steps to ensure that there is no modern slavery or human trafficking in supply chains or in any part of our business.

Because of the nature of the Society's business and supply chains, following careful consideration, the Society considers the risk of the presence of slavery or human trafficking in its supply chains to be low. However, the Society is not complacent in relation to these issues.

During 2023, the Society refreshed and re-published its Supplier Code of Conduct which sets out our expectations of suppliers and is based upon the principles detailed in the UN Global Compact. Amongst other things, this states:

No child labour – There shall be no recruitment of child labour. Suppliers shall not recruit or employ any workers under the age of 16 (or, if higher, the applicable legal minimum age for workers). Persons aged under 18 shall not be employed at night or in hazardous conditions.

Employment is freely chosen – All work must be conducted on a voluntary basis and not under threat of any penalty or sanctions. There shall be no forced, bonded or involuntary prison labour. Suppliers should not utilise forced labour, i.e. all work or service which is exacted from any person under the threat of any penalty and for which the said person has not offered themselves voluntarily. Workers must be free to leave their employer after reasonable notice.

Modern slavery – Suppliers shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force; and not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4 of the UK's Modern Slavery Act 2015, as amended, or other laws or regulations in effect. Suppliers shall include in their contracts anti-slavery and human trafficking provisions that are at least as onerous as those set out in this Code of Conduct and shall implement due diligence practices to support this. Suppliers shall notify the Society as soon as they become aware of any actual or suspected slavery or human trafficking in any supply chain connected to the Society

The Society sees its approach to Procurement and Supplier Relationship Management as an effective measure to enforce a zero-tolerance approach to slavery and human trafficking. Suppliers are required to confirm their agreement and adherence to the Supplier Code of Conduct.

A whistleblowing process operates across the Society for members, suppliers and colleagues whereby concerns can be raised and escalated as applicable.

TRAINING STAFF

All employees are recruited legally and must meet the 1998 Immigration Act requirements. Relevant background screening checks are performed to monitor adherence to this.

The Society provides all staff with training that's relevant to them and their role. In addition, the Society is utilising a financial services industry digital training tool provided via the UK Modern Slavery Training Delivery Group, the UK Independent Anti-Slavery Commissioner, and Themis. This training supports the identification of signs of modern slavery. The Society also ensures that our management teams have additional support which includes guidance to make sure the recruitment process is consistent and the Society's approach to managing

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suppliers is effective. An awareness day was held on 18th October in line with the annual Anti Slavery Day.

We expect all colleagues to be treated fairly and with respect. Our Employee Code of Conduct applies to all Society colleagues (which includes contractors). Employees are requested to attest to the Code of Conduct on an annual basis which incorporates confirming adherence to all required policies and processes.

Support mechanisms are in place for colleagues should any personal support be required linked to modern slavery or human trafficking concerns. This includes a 24 hour, 7 days a week employee assistance helpline and wellbeing programme.

CONTROLS AND OVERSIGHT THROUGHOUT 2023

The Society operates a programme of supplier relationship management and audit activities. Where any concerns arise, a full assessment would be made and appropriate actions taken to address those concerns.

Monitoring of supplier due diligence has taken place throughout 2023 and no concerns or issues have been identified. In addition, no concerns have been raised from our suppliers or our whistleblowing process in 2023.

We conduct regular member Financial Crime Risk Assessments and screening controls which support the identification, reporting and escalation of modern slavery and human trafficking. This activity aligns to vulnerable customer reporting and escalation process.

CONTRACTING

The Society's template supply contracts include supplier obligations in relation to slavery and human trafficking compliance and reporting. The Society continues to be a signatory to the United Nations Global Compact and its pledge to operate in alignment with its ten universal sustainability principles relating to human rights, labour, environment and anti-corruption.

NEXT STEPS

The Society regularly reviews its approach to tackling modern slavery and human trafficking. This helps us engage with suppliers to identify any ethical trading issues and incidents of slavery or human trafficking and take appropriate action.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Society's slavery and human trafficking statement for the financial year ending 31 December 2023.

Thank you for taking the time to read the Society's statement.

This statement has been approved by the Board of Directors of each of Coventry Building Society (on 24 April 2024) Godiva Mortgages Limited (on 18 April 2024) and ITL Mortgages Limited (on 18 April 2024).

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For and on behalf of:

Coventry Building Society
Chief Executive Steve Hughes .....

Godiva Mortgages Limited
Director Lee Raybould .....

ITL Mortgages Limited
Director Darin Landon .....

Date August 2024 .....