

Santander Consumer (UK) plc
Slavery and Human Trafficking Statement

Statement for financial year 2017

This statement is made pursuant to s.54 of the Modern Slavery Act 2015.

It sets out the steps that Santander Consumer (UK) plc (SCUK) has undertaken - and is continuing to take - to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

SCUK has a zero tolerance approach to any form of modern slavery. We are committed to maintaining high ethical standards – adhering to laws and regulations, conducting business in a responsible way, treating all stakeholders with honesty and integrity, ensuring transparency in all business dealings and doing business with organisations that share this commitment.

We are committed to creating effective systems and ensuring that we have controls in place to safeguard against any form of modern slavery taking place within the business workforce or our supply chain.

Our organisation

SCUK is a company based in the United Kingdom. Our business is to provide finance and ancillary products for motor vehicles. Finance includes to our retail and corporate customers and to a network of vehicle dealers. We have a network of suppliers that help us provide products and services to our customers.

Our workforce

We are committed to supporting our colleagues in an inclusive environment which empowers people, encourages individuality and promotes collaboration.

We support our people to achieve a balance between their work and personal commitments through generous family leave policies which offer a range of flexible working arrangements, including options for compressed hours and variable start and finish times. We also offer a variety of contractual arrangements to further build on this flexibility, which enables employees to choose and spread their hours to suit their needs. Every employee has a contract of employment that sets out the terms and conditions of their employment. Part-time employees have the same Terms and Conditions and the same access to benefits as our full-time colleagues.

Our approach is to reward people fairly and motivate our people with a competitive package of pay, benefits, employment conditions and policies. We offer a range of flexible benefits that can be tailored to people's individual needs.

All of our employees are required to go through a vetting process, which includes ensuring they have a right to work in the UK.

We expect our people to act with the highest standards of business conduct at all times to protect our reputation and contribute to a culture that is free from corruption, risk of compromise or conflicts of interest. These principles are set out in our Code of Ethical Conduct and supported by our values and behaviours.

All staff know that they can raise concerns about any malpractice with us through internal and external reporting channels set out in our whistleblowing policy, and this would include any issues relating to modern slavery or human trafficking. The whistleblowing policy is supported by annual training for all colleagues, and we have a zero-tolerance approach to victimisation of whistle-blowers.

Given the nature of our business, and the policies and procedures described above, we are confident that the risk of modern slavery or human trafficking issues arising directly within our workforce is extremely minimal.

Risk Assessment

The introduction of the Modern Slavery Act 2015 (the “Act”) prompted us to review how effectively we prevent slavery and human trafficking in our business and supply chain. We want to take all reasonable steps to make sure we are not supporting modern slavery.

Given the nature of our business and our workforce, the modern slavery risk within our own workforce is negligible. The principal area of modern slavery risk for Santander UK arises in relation to our relationships with third parties, particularly our supply chain.

Our Suppliers

The most salient human rights issue of our business is to ensure our supply chain complies with all applicable laws in the manufacture, development and supply of products, goods and services that are provided to us and our customers. To mitigate these risks, we have in place policies, procedures and controls which allow us understand our supply chain, identify areas of risk and to take any necessary action.

Our procurement is governed by the Cost Management & Procurement Policy, and by the Manual of Conduct in Supplier Relationships. Additionally, our Third Party Risk Management Policy includes processes to identify, assess, manage, and report potential risks in our supply chain.

SCUK conducts a certification process for suppliers. For the purposes of due diligence, all suppliers must complete a Financial Services Qualification System (FSQS) assessment, an online tool that enables them to submit assurances and compliance data to us. This process includes specific questions relating to modern slavery and is completed at the start of a contractual relationship and annually thereafter, to ensure they meet our minimum standards.

Furthermore, all contracts with suppliers require compliance with all applicable laws including modern slavery laws.

Training

All new joiners to SCUK, including contractors based at our sites, undergo a corporate induction and mandatory training programme. This introduces new staff to the standards and values we operate under and the conduct we expect from our employees. Additionally all staff have access to full policy documents that provide them with information in relation to modern slavery and human trafficking.

In addition to this, the contract managers for each supplier are required to complete training on managing third party suppliers. This training provides information on how to identify and mitigate supply chain risk, along with guidance on how to manage supplier relationships and how to identify and report issues, including in relation to concerns related to modern slavery and human trafficking

Effectiveness of our Slavery and Human Trafficking policies and procedures

We have assessed our effectiveness in ensuring that slavery and human trafficking is not taking place in our business and supply chain by considering our overall effectiveness in three separate areas.

Our business and workforce

We consider that our policies and procedures are highly effective at ensuring that slavery and human trafficking are not taking place directly within our business. We review a number of performance indicators in assessing this effectiveness, relating to pay, benefits, employee satisfaction, and the measures taken during employee onboarding. All our employees are paid at least the Living Wage (as set by the Living Wage Foundation) and all colleagues directly employed by SCUUK, including those on fixed-term contracts, receive the same range of benefits.

All of our employees and contractors are required to go through a vetting process, which ensures they have a right to work in the UK. This is effective at ensuring that our employees and contractors have not been subjected to human trafficking.

Suppliers

We aim to ensure that we only do business with suppliers who measure up to our high ethical standards. Accordingly, although we continue to believe that our supply chain presents a low risk of modern slavery issues, we have taken a number of steps to ensure that this aim is formally reflected in our procurement policies and supplier contracts. We will continue this process going forward.

Approval for this statement

This statement was approved by the Board of Directors on 25th September 2018.