



Acenden Limited ('Acenden')

Slavery and Human Trafficking Statement (the 'Statement') 2016/2017

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes Acenden's slavery and human trafficking statement for the financial year ending 31 March 2017

INTRODUCTION

We, as an organisation are committed to combating modern slavery and minimising modern slavery risks within both our organisation and our supply chains

OUR BUSINESS AND ORGANISATION'S STRUCTURE

- We are a mortgage administration company trading in the UK and Republic of Ireland. Our business is within the financial services sector and we are authorised and regulated by the Financial Conduct Authority in the UK (FCA Register No. 438372)
- We provide comprehensive mortgage loan administration servicing including:
 - dedicated special servicing (arrear management);
 - data due diligence;
 - data cleansing and data collection services;
 - portfolio assessment and due diligence services;
 - insurance intermediary activities; and
 - cash bond administration and investor reporting services in support of securitisation programmes
- Acenden is part of the Northview Group of companies (which includes The Northview Group Limited and Kensington Mortgage Company Limited) with our ultimate parent companies being funds owned by Blackstone Tactical Opportunities Advisors LLC and TPG Sixth Street Partners LLC, both headquartered in the United States of America
- Acenden has an annual turnover in excess of £36m

OUR SUPPLY CHAINS

- Acenden and the wider group of companies have approximately 400 suppliers located globally across various sectors including, but not limited to, insurance, IT and consultancy firms
- In view of the Act, we have, and we will continue to improve our process for on boarding new suppliers by way of enhanced contracts that require our suppliers (and their subcontractors) to comply with our policies that relate to the Act
- All new contracts and those that come up for renewal during the current period will include wording regarding compliance with the Act
- We are having more dialogue with suppliers to ensure that they understand our values and help us adhere to those values
- We are committed to reviewing existing suppliers with the aim of assessing whether there is any modern slavery risk exposure based on our suppliers' geographical location, turnover and product or services rendered
- Based on the above exercise, a strategy will be put in place for addressing any risks that are discovered
- We recognise that process improvement both internally and externally is ongoing. Therefore, we will continue to work closely with our suppliers to ensure both businesses are conducted in an ethical and transparent manner

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

- We are committed to working towards ensuring that there is no modern slavery or human trafficking taking place in any part of our business or that of our supply chains
- We are developing a standalone Anti-slavery Policy which will reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to combat slavery and human trafficking in our business or supply chains

TRAINING

- We are committed to raising modern slavery awareness within our organisation
- We want our employees to understand what modern slavery is and its adverse effects on people's lives

- We want our employees to be able to recognise instances of modern slavery if they came across them, be it inside our organisation or supply chains
- We want our employees to be able to spot the signs of modern slavery in their surroundings
- We want our employees to be able to report any suspicions they may have without recrimination and, where desired, in confidence using our whistleblowing procedures
- We have rolled out a group-wide modern slavery eLearning to our existing employees and contractors
- We have put processes and procedures in place to ensure that new employees are prompted to undertake the modern slavery eLearning as part of their induction programme
- Modern slavery eLearning has been incorporated into employees annual computer based training programmes

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, we undertook the following:

- Carried out enhanced vetting procedures on all our new suppliers prior to on boarding
- Educated all our employees on modern slavery so that they can spot the signs of slavery and human trafficking
- Educated our employees on how to report suspected slavery incidences and reiterated the importance of ensuring that whistleblowers were protected and would not face any recrimination
- In addition to promoting our whistleblowing procedures to report suspicious incidents, employees were also provided with external contact details of the Government Modern Slavery Helpline (0800 0121700)
- Identified and assessed potential risk areas in our supply chains
- Mitigated the risk of slavery and human trafficking occurring in our supply chains
- Monitored potential risk areas in our supply chains

SUPPLIER ADHERENCE TO OUR VALUES

- We have established a zero tolerance to slavery and human trafficking
- To ensure all those in our supply chain and contractors comply with our values, we are working to enhance current processes through a team composed of the Company Secretary, representatives from Procurement, Legal, Risk and HR departments

FURTHER STEPS

Following a review of the effectiveness of the steps we took in the previous financial year to raise awareness of the Act within our organisation and supply chain, we have identified further opportunities for improvement, which will be the focus of our efforts in 2017/18, namely to:

- Develop key performance indicators to assess the effectiveness of the anti-slavery policies and procedures
- Develop a standalone modern slavery and human trafficking policy
- Identify key risk exposures along the supply chain and put in place appropriate controls
- Determine how supplier oversight and monitoring is to be implemented


Paul McMillan
CEO

For and on behalf of Acenden Limited

Date: 02 October 2017

