

Modern Slavery Statement for financial year ended 30 September 2023

1. Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Brent Shrine Credit Union trading as My Community Bank (“MCB”) has taken and will continue to take to ensure that modern slavery or human trafficking is not taking place within our organisation or supply chain. This statement constitutes MCB’s slavery and human trafficking statement for the financial year commencing 1 October 2022 and ending 30 September 2023.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. MCB has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

As part of the community finance sector MCB recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

2. About MCB

MCB is a community credit union which only operates in Great Britain. MCB is owned and managed by its members, through our board of directors, and belongs to its member community. Our product range includes affordable loans, savings accounts and online and telephone banking services. MCB is regulated by the Prudential Regulation Authority and the Financial Conduct Authority.

3. Our Commitment To The Principles Of The Modern Slavery Act 2015

MCB is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. We acknowledge the role that we can play to help to bring this about.

We are an equal opportunities employer, fully committed to creating and ensuring a non-discriminatory, inclusive and respectful working environment for all our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We recognise that we have the opportunity to influence good practices in the employment of people by other organisations who supply us with goods and services.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

4. Our Policies

As part of our commitment to combating modern slavery, our organisation has implemented and operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

a. Whistleblowing Policy

The organisation encourages all its employees and directors to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

b. Employee Code of Conduct

The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

c. Supplier/Procurement Code of Conduct

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Where necessary, suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

5. Risk and Compliance

MCB evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain.

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains. We do not manufacture goods, operate factories or handle raw materials or commodities. MCB has identified no activities as high risk.

6. Training

We educate our staff to recognise the risks of modern slavery and human trafficking.

This statement has been approved by MCB's board of directors. It will be reviewed and, if necessary, updated annually by our Legal and Compliance Department.