

## **Modern Slavery Statement 2019**

This statement is made on behalf of Paratus AMC (the “Company”) pursuant to section 54(1) of the Modern Slavery Act 2015 (‘the Act’) and covers the financial year ending 31<sup>st</sup> December 2019.

The Company trading as ‘Foundation Home Loans’ is committed to ensuring there is no modern slavery or human trafficking in any part of our business or supply chain. The Company recognises that modern slavery and human trafficking exists across various industries and take a zero-tolerance approach to facilitating this within Company’s own operations.

### **Our Business**

The Company originates Buy-To-Let and Residential mortgages as well as operating a loan administration and servicing business. The Company sells its products to individuals and businesses through professional advisers. The Company is incorporated in England and Wales with registered number 03489004. The Company’s registered office is at 5 Arlington Square, Downshire Way, Bracknell RG12 1WA. The Company is authorised and regulated by the Financial Conduct Authority (FCA Number: 301128).

The Company operates in the United Kingdom but is ultimately owned by funds managed by Fortress Investment Group LLC, headquartered in the United States of America.

As a business, we seek to identify any risks of modern slavery and human trafficking and any risk of it occurring with our direct suppliers through robust policies and processes.

### **Our Supply Chains and Due Diligence**

Our supply chain includes the purchasing of goods and services that support the operation of our business. Consumables purchased include office supplies, marketing materials, IT equipment and services such as credit reference agency data, cleaning, and office fixtures and fittings. As the Company is not in an industry with a high risk of modern slavery, a risk-based approach has been implemented when reviewing its supply chains.

We have taken appropriate steps to ensure that slavery or human trafficking is not taking place in our supply chains by reviewing existing business and supply chains; reviewing our procurement processes; enhancing due diligence process; and conducting a risk assessment with due regard to the sector and geographical locations in which our suppliers operate. We are committed to ensuring that our supply chain is free from these invidious practices.

As part of our due diligence processes, when seeking to enter into significant business relationships with prospective suppliers, we aim to ensure that prospective suppliers complete a robust due diligence compliance check. This due diligence compliance check has been updated to include information relating to a prospective supplier’s compliance with the Modern Slavery Act 2015.

New suppliers may be required to provide detailed information about their human rights policies, processes and risk assessments, including the prevention of slavery and human trafficking within their own organisation and supply chains.

#### Agency workers and Sub-Contractors

Any employment agencies which supply us with workers or contracted staff will be advised of our Anti-Slavery Policy and must confirm that they will comply with its terms or confirm a similar commitment to the steps outlined in our Anti-Slavery policy.

#### Policies and Procedures

Our robust policy framework ensures good practice, ethical behaviours, integrity and prohibits modern slavery and human trafficking. We continue to review relevant policies to ensure they comply with the legislation. The purpose of our policies is to identify, mitigate and resolve incidents as and when they arise. Our policies include:

- Our Values
- Code of Conduct
- Procurement and Vendor Management Policy
- Financial Crime Policy
- Broker Due Diligence Policy
- Gifts and Hospitality Policy
- Conflict of Interest Policy
- Anti- Bribery Policy
- Recruitment Policy
- Whistleblowing Policy
- IT Due Diligence Process
- Training Policy

#### Employees

We comply with, as a minimum, all employment law requirements in the UK and we ensure that all our employees and contracted staff have the right to work in the UK. Our employment contracts honour employee rights and the company actively promote employee welfare.

#### Training

We require our staff 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 Conduct and supported by our values and behaviours.

This statement has been approved by The Company's Board of directors on 20 November 2019 and will be reviewed annually.