



## Modern Slavery & Human Trafficking Statement

This statement has been published in accordance with the Modern Slavery Act 2015 and sets out the steps that Tower Leasing Ltd has taken and continues to take to ensure there is no slavery or human trafficking within our business or our supply chains.

Tower Leasing Limited is a UK registered company providing funding with the support of brokerage facilities which enable companies across the UK to acquire capital equipment through leasing. All of our directly employed staff are based in the UK, and it is the policy of Tower Leasing Limited to conduct business in an honest and ethical manner which is why we take a zero-tolerance approach to modern slavery and are committed to preventing and protecting people from slavery and human trafficking in our business activities.

### Our Commitment

We seek to operate in an open, ethical manner in all our business dealings. We believe that modern slavery is an unacceptable issue. Our policy is to assess and address modern slavery laws within our own business and we expect those organisations with whom we do business to adopt and enforce policies to comply with the legislation.

As an equal opportunities' employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for 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 do not enter into business with any organisation, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

### Organisational structure and supply chains

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our primary business activity is that of a Credit Broker with funding facilities operating in both the corporate and consumer marketplaces. Our supply chains are limited and are predominately a select panel of finance providers who provide funding options for capital equipment which we source through our network of suppliers. We consider the sectors in which we operate and our supply chains to be at lower risk of modern slavery but recognise that our business is exposed to greater risk when dealing with suppliers.

All the suppliers for our core business are registered and trade in the UK.

Tower only accepts business from Suppliers who have already been through our approval process and reserve the right to carry out audits of Suppliers/third party Introducers to ensure their compliance with financial crime regulation.

We maintain a level of communication and personal contact with suppliers to ensure their understanding of, and compliance with, our expectations. We will, under no circumstances, support or engage with suppliers who are aware of slavery or human trafficking within their business practices or supply chain.



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### Our people

We ensure all employees have the right to work in UK.

Our people are our most highly valued asset and are critical to Tower's success and growth.

Our core values set out guiding principles for members of staff which outlines they should always act lawfully and ethically.

All staff undertake mandatory compliance training courses which outline these values further.

### Our policies in relation to the Modern Slavery Act 2015

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. Some of which include:

**Whistleblowing policy** - We encourage all staff to report any concerns related to our activities and those of our suppliers. This includes concerns around modern slavery in our business or supply chain.

**Treating customers fairly and Consumer Duty Policies** - These policies explain the manner in which we behave as an organisation and how we expect our employees and suppliers to act and treat our customers.

**Equality, diversity & inclusion policy** – We encourage fairness and equal opportunities through recognising, respecting, and celebrating each other's differences. This policy explains how we expect our employees and suppliers to act and treat each other and our customers.

**Code of Conduct policy** – This policy sets out our purpose and values and the minimum standards of conduct expected from all Tower employees. All decisions should be guided not only by applicable laws and regulations and internal guidelines, but also by what is the right thing to do.

**Recruitment policy** – This policy explains how we use systems that include checks that must be completed before engaging workers, including right to work checks, face to face interviews and obtaining references.

### Embedding the principles

Our Modern-Day Slavery statement is published on our website and our internal network drive for easy accessibility for all members of staff and customers.

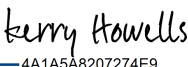
We will continue to promote our Whistleblowing Policy should anyone wish to raise a concern.

We will work with our suppliers and review our processes to identify any additional measures we can take as a business to combat modern slavery and human trafficking.

Our recruitment process ensures that Tower only recruit employees in a fair, lawful, and professional manner, with robust checks completed throughout the on-boarding journey to ensure we do not employ individuals that are facing or involved in, enforced servitude.

This statement has been approved by our Board of Directors and will be reviewed and updated annually.

Kerry Howells, Managing Director

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