

Modern Slavery Statement

Funding Circle is a global small or medium-sized enterprise (“SME” or “SMEs”) loans platform, connecting SMEs who want to borrow with investors who want to lend in the UK, US, Germany and the Netherlands.

As required by the Modern Slavery Act 2015, this statement describes the approach of – and steps taken by – Funding Circle Ltd and its UK-based affiliates during the financial year ending on 31 December 2019 in relation to the detection and prevention of slavery and human trafficking in our own business and supply chain.

Modern Slavery Statement

We have a zero tolerance approach to modern slavery and human trafficking and we are committed to ensuring that our business operates in a socially responsible way. We are committed to playing our part in helping the world to improve practices designed to combat slavery and human trafficking.

Our Culture

In line with our ambition to build a better financial world, we strive to act with integrity at all times and to conduct our business in a fair and transparent manner.

We conduct our business at all times in accordance with certain guiding principles which represent the high standards that we set ourselves and exemplify the ethos and values which we seek to inculcate in all of our employees. These include “Being Open” (where we recognise the importance of transparency, treating people well and honesty) and “Think Smart” (where we encourage the asking of questions and positive challenge). We assess employee performance against these principles.

Our Employees

We employ people from a diverse range of backgrounds who all share, and subscribe to, the ambitions and values of our business.

All our employees undertake a learning and development programme which includes training in relation to:

- the regulatory environment in which we conduct our business; and
- the policies, practices and professional standards we adopt.

The maintenance of exemplary professional and ethical standards is extremely important to us and the way in which we conduct our business, and employees are aware of the possibility of sanction in the event of contraventions of, or non-compliance with, them.

Our Policies, Processes and Procedures

We are committed to act with integrity in all of our business activities and to comply with all applicable laws and regulations to which we are subject. Our relevant policies include those relating to:

- anti-money laundering and counter-terrorist financing;
- conflicts of interest;
- anti-bribery and corruption;
- whistleblowing;
- the protection of data and data confidentiality; and
- procurement.

In addition, we have developed standards, processes and procedures including:

- the monitoring and review of the effectiveness of our internal policies and their implementation;
- ongoing supplier risk/impact assessments and due diligence on proposed and existing service providers;
- those to support an inclusive, open and tolerant workplace environment; and
- those relating to the raising of concerns or poor practice by our employees and those with whom we deal.

Our Supply Chain

Our supply chain service partners principally involve suppliers of technology, data, office and facilities supplies, and professional advisory firms, amongst others. We undertake detailed due diligence on proposed suppliers to ensure that they are a suitable organisation with which to do business, which includes:

- assessing the selection and management of their employees;
- the selection and management of their sub-contractors and their supply chain; and
- their commitment to corporate social responsibility.

We do not tolerate slavery and/or human trafficking within our supply chains and would seek to terminate any relationship with a supplier where evidence of the same occurred.

Given the nature of our business, we do not consider that we operate in a sector where modern slavery and human trafficking are particularly prevalent or of high risk, however a small proportion of our service providers have business operations within geographical locations that do represent an elevated risk. In 2019 we strengthened our supplier assurance programmes to ensure that our supply chain services partners comply with, and are aligned to, our values and

our commitment to ensure that there is no slavery or human trafficking arising in our supply chains or in any part of our business.

We have not, to date, had any reportable incidents of non-compliance with our Statement since first published.

The directors of Funding Circle Ltd approved this statement on 7 April 2020.



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Lisa Jacobs, Director

5 May 2020