

1. Modern Slavery Statement for Financial Year 2016/17

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Castle Trust Group (being Castle Trust Capital plc, its subsidiaries and each of their employees and officers, together "Castle Trust") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. This is the first statement published by Castle Trust.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Castle Trust 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

2. Our business

- 2.1 Castle Trust operates within the financial sector, providing investment products and flexible lending solutions to clients in the UK. Based in London, with offices in Basingstoke in Hampshire, the Castle Trust Group comprises Castle Trust Capital plc and nine subsidiary companies.
- 2.2 We source goods and service from a variety of suppliers based predominantly in the UK, including for:
 - 2.2.1 IT – software and hardware
 - 2.2.2 Professional services
 - 2.2.3 Facilities
- 2.3 Additionally, we work with a number of third parties to provide services within the lending market.
- 2.4 Castle Trust has a consolidated annual turnover of £37,627,000.

3. Our policies

- 3.1 We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:
 - 3.1.1 Human Resources Policy. We operate a robust human resources policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
 - 3.1.2 Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
 - 3.1.3 Business Conduct Policy. This code explains the manner in which we behave as an organisation and how we expect our employees and associates to act. Castle Trust operates under its values of Tenacity, Remarkable, Unconventional, Simple, Together (TRUST).
 - 3.1.4 Governance. Castle Trust will establish a working committee to address areas identified as impacting Modern Slavery and to ensure that Castle Trust continues to consider the best ways to reduce the risk of Modern Slavery taking place within its business or supply chain. The working committee will be chaired by the Head of Human Resources and will report into the Executive Committee of Castle Trust.
 - 3.1.5 Anti-Money Laundering and Financial Crime. Castle Trust has in place comprehensive policies and procedures to minimise the risk that it is used for financial crime.

4. Suppliers and Third Parties

- 4.1 As part of our policies we are proposing to identify and mitigate risk by undertaking increased due diligence in respect of our business and supply chains. During 2018 we will be putting in place a review of our policies around supplier and third party appointment, which will include the conduct of risk based due diligence on suppliers and third parties before contracting with them. Contracts with suppliers and

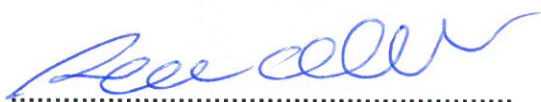
third parties will be reviewed on a risk based approach and all new contracts will be reviewed to ensure they contain appropriate terms.

5. Training

- 5.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are looking to introduce training to our staff during 2018, which will then form part of the induction training provided to all staff on joining the business.
- 5.2 We are still developing our approach to demonstrating the effectiveness of our policy on modern slavery and remain committed to ensuring that high risk areas are identified and that modern slavery is not taking place within our business.

6. Approval for this statement

- 6.1 This statement was approved by the Board of Directors on 28 February 2018

Signed by 

Name of Director SEAN OLDFIELD

Date 26 MARCH 2018