

## Modern Anti-Slavery Statement

Keystone Property Finance Limited  
42 Kings Hill Avenue, Kings Hill, West Malling, Kent ME19 4AJ

Registered in England and Wales No. 06262873

Registered Office: 17 Kings Hill Avenue Kings Hill, West Malling, Kent, ME19 4UA

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## **1 Introduction**

Keystone Property Finance Limited (KPF), a Buy-to-Let lender, outsources some of its loan administration services to Pepper UK Limited. KPF is incorporated in England and Wales with registered number 06262873 and the registered address is 17 Kings Hill Avenue, Kings Hill, West Malling, Kent, ME19 4UA.

KPF opposes all forms of slavery, which can include, but is not limited to:

- Human Trafficking
- Drug Trafficking
- Sex Trafficking and
- Unpaid Labour

## **2 Our Business Structure**

KPF is an intermediary only lender who does not meet its potential customers face-to-face and has no physical branches. KPF and its Parent company, The Property Business Group, only has offices in the UK.

In order to reflect its commitment to acting ethically and with integrity, KPF has a robust due diligence approach in place.

## **3 Statement on Modern Slavery and Human Trafficking**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and is KPF's modern slavery and human trafficking statement for the financial year ending December 2022. KPF takes a zero-tolerance approach to slavery.

Our internal policies, in particular, the Outsourcing policy and process and our broker management process, guide our approach to ensure the prevention of modern slavery and human trafficking in any part of our business or supply chain.

## **4 Whistleblowing Policy**

KPF's whistleblowing policy encourages employees to play a key role in preventing and detecting wrongdoings within the company by raising their concerns about any suspected or known criminal conduct happening through the company, its customers or third parties.

## **5 Employment Policy**

KPF is committed to treating all employees with respect and aims to create an environment that is free from discrimination, harassment, and any form of bonded or forced labour by following set procedures to recruit new employees which include, but is not limited, to carrying out Enhance Due Diligence and Anti Money Laundering checks before onboarding new employees.

## 6 Third-Party Due Diligence

KPF's success depends not only on our technical ability, but also on our employees and wider workforce acting ethically. KPF is committed to complying with the applicable regulations that apply to our industry while creating a fair and transparent working environment within our business.

We expect the same of our material suppliers and focus on developing relationships with these suppliers based on transparency. Although our material suppliers operate independently and in different industries, KPF recognises that their actions can impact our reputation. As such, we strive through our Outsourcing Policy and Broker Management process to select suppliers that share our values and demonstrate a commitment to the highest professional standards and ethical conduct in their business dealings. KPF's Senior Compliance Manager oversees the procurement process before final sign off by the Managing Director and CEO, where appropriate.

The nature of KPF's business is such that our material supply chain consists primarily of professional services suppliers: such as intermediaries, solicitors, administrators, surveyors, storage facilities, office supplies and technology providers, substantially all of which are based in or operating from the United Kingdom. Although KPF considers these to pose a relatively low level of risk related to Modern Slavery, KPF is committed to taking all appropriate steps to mitigate the risk of slavery by ensuring due diligence is carried out at onboarding and on an ongoing basis.

We have not identified any areas requiring immediate action with regard to such relationships beyond our current policies.



## 7 Version Control

Document revised 23 Dec 2022