

OUR APPROACH TO SUSTAINABILITY

At Belmont Green we believe a clearly articulated approach to sustainability is how we best support our purpose and deliver our business strategy and in a way which is consistent with our values. We believe we can have a genuine and positive impact and by implementing our ESG Strategy we will have the best chance of becoming the sustainable bank which we aspire to be.

Our Environmental, Social and Governance (ESG) Strategy was approved by the Board in December 2022 and throughout 2023 we have focussed on implementing the Strategy and embedding a sustainable mindset across the business. A number of important initiatives have been delivered and we have enhanced our data and reporting, therefore we were delighted that the progress we have made was recognised with a gold medal accreditation from EcoVadis, one of the world’s leading business sustainability rating companies placing Belmont Green in the top 5% of companies assessed by them.

We have integrated sustainability in the way we operate our business, supporting the underserved borrower, nurturing a diverse and committed workforce and ensuring we make a positive contribution to society, and contribute to the three United Nations Sustainable Development Goals we identified in 2022 that align with our strategy.

In 2023 we updated our materiality analysis to understand the sustainability topics that matter most to our stakeholders, and we were pleased that the feedback showed that our current strategy, including our Culture and ESG Priorities align with the material topics identified.

CUSTOMER SATISFACTION	RISK MANAGEMENT	EMPLOYEE HEALTH & WELLNESS	BUSINESS MODEL RESILIENCE	ENVIRONMENTAL MANAGEMENT	CULTURE & PURPOSE
Providing products and services which give good customer outcomes, ensuring support is available for vulnerable customers.	Managing both financial and non-financial risks within the business. Ensuring our business is protected from and prepared for risks and potential disruptions.	Providing a safe and flexible workplace and supporting employees’ health and wellbeing.	Ensuring that our business can survive under potentially difficult market conditions.	Reducing the impact we have on the environment through our operations and activities.	Ensuring our caring culture and Vida values are central to the way we in which we achieve our goals.

We will continue to enhance our sustainability-related disclosures as the governance and reporting landscape for ESG continues to develop and we will seek to set more ambitious targets and deliver further initiatives that will support our stakeholders.

Embedding ESG into the culture and governance across Belmont Green will help to ensure we achieve good outcomes for our customers, our colleagues feel supported and empowered, our company effects responsible decision making, and we are able to have a positive impact with our charity partners and our wider business community.

OUR ESG STRATEGY

At Belmont Green our culture is founded on the ethos of caring, it sits at the heart of our values, driving the way we run our business and interact with our stakeholders. Our ESG Strategy is an integral part of our Culture Strategy and builds upon a number of the Culture Priorities where directly relevant to ESG matters, supporting our Purpose and delivery of our strategic plan.

Our ESG Vision is simple and focuses on building a safe and sustainable business. It takes into account the interests and priorities of all our stakeholders whom we consider through the cultural framework of 4C's; our Customers, our Colleagues, our Company and the wider Communities in which we operate.



CUSTOMERS

At Belmont Green, our commitment to understanding, respecting, and addressing our customers' needs has been pivotal in establishing a successful, sustainable, and responsible specialist mortgage lending business. Our goal is to broaden access to our services, enabling both new and existing mortgage customers to progress on their home ownership or landlord journey through competitive product offerings.

In 2023, we streamlined our credit tiering for both ROO and BTL markets to enhance accessibility for more customers, particularly those with past adverse credit issues. We implemented several improvements to our lending criteria, covering borrower, affordability, and property requirements. Furthermore, we expanded our support for homeowners, landlords, and intermediary partners by introducing new products. These include a range of Later Life lending option and the inauguration of our bespoke Premier Packager Club, offering a unique proposition and service tailored to more specialist customers.

Our approach is underpinned by a commitment to treating customers fairly and fulfilling regulatory obligations, principles that guide decision-making at both the Board and Committee levels. We have undertaken important steps in embedding the Consumer Duty requirements across the business in order to continue to deliver good outcomes for our customers. Our colleagues continue to work hard to provide the high levels of service that our customers and intermediary partners expect, and we ensure that support is offered to all customers, including those who may be vulnerable or in financial difficulty, throughout their journey with Belmont Green. The Senior Independent Director, who is the Chair of the Board Risk Committee, is also our Consumer Duty Champion. This helps us ensure that in the discussions and challenge taking place at Board level, the principles and practice of under the Consumer Duty are truly embedded into the organisation driving good outcomes for customers.

“Amazing support, answering the phones in a timely manner and above all else, the human touch to underwriting. Worth it's weight in gold with complicated portfolios. Shout out to Anastasios Demetriades for his time and support with my latest case.”

★ ★ ★ ★ ★



1.18%
CLAIMS FILED UNDER THE NEW 'SERVICE PLEDGE' GUARANTEE

REGULATORY CONTEXT – CONSUMER DUTY

Our progress towards implementation of the Consumer Duty is covered in the Strategic Progress section. The below summarises this approach against the four key outcomes:

Products and Services – We have a robust Product Governance Framework in place to ensure our products are designed to meet the needs of our target customers. As part of the framework, a ‘Value Proposition Canvas’ has to be completed for all new propositions. This includes clearly identifying the target borrower and their needs, and how the proposition will meet those needs. The framework also includes Annual Product Reviews to monitor that our products are performing as anticipated.

Price and Value – Our approach to pricing is designed to offer fair value to customers throughout their product lifecycle. Our pricing principles are the cornerstone of this approach and are the standard that all product and pricing changes have to meet. These principles cover new business, retention products and revert rates and are supported by a robust pricing model, which allows full assessment of each product against the principles set. Further detail on our assessment of fair value is included earlier in this section under ‘Our Pricing Strategy and Assessment of Fair Value’.

Consumer Understanding – We believe it is important that all customers taking a new mortgage receive impartial advice to enable them to make an informed decision. Consequently, our new lending is distributed solely through intermediaries. We provide intermediaries with full details of our products, pricing and criteria,

which is supported by both more detailed information on our website and our V-Hub, giving intermediaries direct telephone access to our underwriters. Further information is provided earlier in this section in ‘Intermediary Distribution’. Product Transfers are able to be made direct through our online portal both on an execution only basis, as well as through an intermediary. All customers approaching the maturity of their product are sent a number of written communications detailing the options available to them at maturity. Within both these communications and our online portal customers are recommended to contact an independent financial advisor if they are unsure of the best option for them. As part of our Product Governance Framework a Value Proposition Canvas has to be completed for all new propositions, which includes sections on how we will ensure customer understanding, an assessment of the suitability of the distribution strategy, and consideration of the impact on vulnerable customers.

Consumer Support - Post completion, customers are supported by our contact centre and a dedicated existing customer section of our website. Our contact details are prominently displayed in all communications, both pre and post completion, as well as on the website. Our online mortgage service allows customers to check their mortgage balance, make a payment and contact our customer service team. Customers are proactively encouraged to contact us if they have any concerns making their mortgage payment. This is supported by online content with details of debt advice and support available. Robust processes exist to support vulnerable customers, with markers used to ensure they are clearly identifiable and ensuring that the customer is supported appropriately.

We continue to maintain strong dialogue with our intermediary partners and are committed to the highest standards of customer care. The changes we made to our operating model in 2022, providing our intermediary partners with direct access to our underwriters through our V-Hub and the launch of our ‘service pledge’ in early 2023, both demonstrate our commitment to offering excellent service. This is key in our business model when delivering excellent service to our intermediary partners that our customers benefit as a result.

Customer service is closely monitored and discussed at the Customer Committee and the Board. Quarterly engagement surveys are run to seek feedback directly from our customers and intermediary partners, and in 2023 our Intermediary NPS score remained consistently positive throughout the year, reaching +34 in Quarter 4. The overall NPS score for the year was +32 (2022: +35). We also achieved ‘Excellent’ status on Trustpilot at 4.4 out of 5 (2022: 3.8), with over 700 reviews.

An established governance framework, policies and procedures are in place to ensure we lend responsibly within our credit risk framework and risk appetite and that we observe best practice in looking after our customers and their data. Such policies include Responsible Lending Policy, Credit Lending Policy, Customer Policy including Vulnerable Customers and Arrears Management Policy.

Personal information is managed in accordance with the Data Protection Regulation and the General Data Protection Regulation Principles. The Data Protection Policy is owned by the Chief Risk Officer, with day-to-day responsibility delegated to the Director of Compliance who is also our Data Protection Officer and outlines the risks and procedures which are in place, privacy notices are also available on our websites. Annually all colleagues are required to complete data protection training and assessment to ensure they understand the obligations placed on them and the company.

At Belmont Green, we recognise that we don't always get everything right, and our published Complaints Policy details our approach to handling complaints to ensure fair outcomes for our customers. We are committed to managing complaints justly and resolving them as swiftly as possible. Our goal is to learn from these complaints by identifying and addressing the root causes. Information on how complaints are handled is regularly reviewed and discussed at the Customer Committee, with significant findings escalated to the Board Risk Committee and subsequently reported to the Board. In 2023, we referred 16 complaints to the Financial Ombudsman Service (FOS), none of which were upheld, affirming the effectiveness of our internal resolution mechanisms.

We remain very aware of the challenges and downside risks related to rising living costs and higher interest rates and recognise that some customers using our products may become vulnerable due to personal or unforeseen circumstances. We aim to provide a proactive approach to the handling of such customers to ensure fair treatment and good customer outcomes by exploring and agreeing reasonable measures of support. Customer vulnerability is well documented and understood across the business with Vulnerable Customer Standards supporting an overarching Customer Policy. The identification of and fair treatment of vulnerable customers is monitored by all three lines of defence in their relevant monitoring and testing frameworks. Key risk indicators and oversight management information are reported to the Customer Committee and, where appropriate the Executive Risk Committee and Board Risk Committee.

From the start to the end of their journey with us, we want to ensure our customers can trust us to put their needs and financial objectives at the centre of every decision we make, to do what's right and to support them through the challenges they face along the way.

COLLEAGUES

Our colleagues are the foundation of our business, and we want to create an inclusive workplace environment in which colleagues are encouraged to develop and pursue their personal and career goals, where they feel valued and understand the contribution they are making to Belmont Green.

LEARNING AND DEVELOPMENT

Our updated Learning and Development Framework encourages personal and professional development and provides a wealth of training support and opportunities through our new digital learning hub and through face-to-face workshops led by our Learning and Development team. During 2023 a series of soft skills workshops was made available to all colleagues, and we supported a number of colleagues through professional qualifications.

All colleagues are required to undertake specific training modules throughout the year to ensure they have the skills necessary to undertake their roles and we support colleagues in gaining professional qualifications where required. At an individual level,

people managers are expected to drive conversations about our values and behaviours with their teams and to support colleagues with the implementation of their Personal Development Plan.

An online performance management tool, *Appraisd*, is used and specifically prompts discussion and feedback on each colleague's alignment to our culture and values, and development progress conversations are prompted at all mid-year and end-of-year reviews.

RECOGNITION

An important part of the Belmont Green culture is to ensure our colleagues' voices are heard and that their contribution is recognised. Sitting within our virtual workspace, our recognition platform, Applause, encourages greater interaction from all areas of the business and makes it easy for people to say 'thank you' or 'well done'. In 2023 over 361 shout outs were given to colleagues and 289 colleague nominations and 25 group nominations were made for a V-Star award, our quarterly awards process which invites colleagues to recognise their peers for demonstrating our values and celebrating where individuals have gone above and beyond.

In March 2023, we initiated 'The Big Idea,' inviting colleagues to suggest improvements to our work processes, and we are delighted to have collaborated with individuals and groups from all corners of the business to implement the top three ideas that emerged.

EQUALITY, DIVERSITY AND INCLUSION

At Belmont Green, we are committed to encouraging a supportive and inclusive culture. We believe that promoting diversity within the workplace is simply the right thing to do and we strive to ensure that those who work within our business reflect the customers and communities we serve.

Being an inclusive business is key, not just to ensure a sense of belonging within the organisation and to retain colleagues, but to be able to understand and respond to the needs of our customers and other stakeholders who represent the whole spectrum of a diverse society.

We want Equality, Diversity and Inclusion (EDI) to be at the heart of the organisation and to run through everything that we do. Through our policies and calendar of initiatives to support awareness, we have made good progress in promoting diversity within Belmont Green.

Our EDI Charter outlines our commitments, and the EDI Forum consists of colleagues from across the business who bring a diverse set of views. Together, they have developed a focused agenda that encourages discussion, engagement, and improved awareness. This includes initiatives such as ensuring gender diversity and promoting the development of women, supporting people with disabilities (including those with hidden disabilities), celebrating different cultures, races, and religions, as well as a commitment to raising awareness around the importance of good mental health. In 2023, we were also proud finalists at the Financial Reporter Women's Recognition Awards.

CULTURAL DIVERSITY¹⁴

29%
2022: 30%



25 RECOGNISED AS TOP 25 COMPANIES IN FINANCIAL SERVICES TO WORK FOR IN THE UK ACCORDING TO BEST COMPANIES



81% OF COLLEAGUES ARE HAPPY WITH THE BALANCE BETWEEN WORK AND HOME LIFE



87% OF COLLEAGUES VALUE THE FLEXIBILITY TO WORK IN WAYS THAT SUIT THEM BEST

ENGAGEMENT

We were delighted to be recognised in the 2023 Best Companies league tables as one of the top 25 companies in financial services and top 100 best mid-sized company to work for in the UK. At a company level, culture and employee engagement is measured through our annual engagement survey and colleague engagement remains high with engagement levels in excess of 90%. In February 2024, we were awarded a Best Companies ‘1 Star’ accreditation, signifying ‘very good’ workplace engagement levels once again. Insights from the 2023 survey have been instrumental in identifying areas for improvement, leading us to develop targeted action plans alongside our Culture Champions.

Colleague wellbeing is very important to us. At the beginning of 2022 we moved to a hybrid working model which has enabled colleagues to better balance work and home lives in a way which suits their own needs as well as the business. We reviewed our employee proposition during 2023 and made enhancements to maternity, paternity and shared parental leave benefits and introduced V-Time; an approach to unplanned leave which supports colleagues by giving them the space and time they need when they need it. Annual leave was also increased, and all colleagues receive an additional day of leave for their birthday. In the latest engagement survey, 81% of colleagues confirm that they are happy with the balance between work and home life, while 87% report having the flexibility to work in a way that suits them.

All colleagues are offered a comprehensive benefits package to support their professional and personal needs. This includes private medical cover, annual health MOT, Life Assurance, Income Protection Assurance, Company Pension and Annual Leave. With the rising cost of living we have hosted financial wellbeing sessions through our external benefits brokers AON. Several channels are in place to help colleagues and their families should they need support, including Vitality and our Employee Assistance Programme and we have 9

Mental Health First Aiders across the business who help raise the understanding of mental health in the workplace and provide initial support and signposting to colleagues.

To support the embedding of our values and creating a caring culture where people feel a sense of belonging and engaged with the business, we have the role of Culture Champion. Our Champions’ network is made up passionate colleagues, with representatives in all departments. In line with the refresh of our values, the role of our Culture Champions evolved, and key responsibilities include:

ACTING AS A ROLE MODEL FOR OUR VALUES.

HELPING US TO EMBED AND BRING TO LIFE OUR UPDATED VISION, PURPOSE AND VALUES.

ENCOURAGING PEER-TO-PEER RECOGNITION AT ALL LEVELS.

SUPPORTING OUR PARTNERSHIP WITH CRISIS.

ENSURING OUR PEOPLE KNOW THEY HAVE A VOICE AND THAT IS HEARD BY REPRESENTING THEIR TEAMS AT MONTHLY MEETINGS.

HELPING US TO PLAN, FACILITATE AND PROMOTE SOCIAL ACTIVITIES.

ENCOURAGING TEAMS TO COMPLETE OUR ANNUAL ENGAGEMENT SURVEY, PULSE SURVEY AND COLLEAGUE NPS

COMPANY

We are building a brand which we want all stakeholders to trust, delivering our strategic priorities in a manner consistent with our cultural values in an environment where everyone takes accountability, speaks up and does the right thing. Operating within a robust governance and risk framework helps ensure that the decisions and actions we take are ethical, support good customer outcomes and align with our purpose and values. To achieve this, we believe that having a diverse workforce, including among the senior decision makers, is key to enabling better decision making which avoids groupthink and allows for a variety of perspectives to be heard. This in turn assists with both the recruitment and the retention of talent.

Belmont Green actively monitors diversity metrics through its ESG Scorecard and made a significant commitment to gender equality by endorsing the Women in Finance Charter in 2021. We proudly achieved a gender balance target of 50/50 among men and women across our Senior Management in 2023. This group includes the Executive Team, Management Board, and Heads of Function. Striving for these ambitious targets, we leverage a hybrid working model and a compelling employee value proposition.

This year, we’ve implemented several initiatives to foster diversity, such as overhauling our recruitment process to anonymise CVs, ensuring discrimination-free selection, diversifying interview panels, and launching training programmes focused on inclusivity and bias mitigation for managers. These efforts are designed to propel diversity improvement across the organisation.

As an advocate for equal opportunity, Belmont Green pledges to remunerate all employees at least at the level of the National Living Wage. Since 2020, we have voluntarily produced gender pay gap reports, a practice we intend to maintain. Oversight of gender pay disparities and the formulation of corrective measures are entrusted to the Remuneration and Nominations Committee and Culture Committee, underscoring our commitment to fairness and equality in the workplace.

Looking ahead to 2024, we will refine our approach to data collection and set out new, and better informed targets. This initiative will be undertaken with a keen awareness of regulatory standards, ensuring our objectives align with both our commitment to diversity and compliance obligations.



COMMUNITIES

Belmont Green is committed to supporting the communities in which we serve. We seek to foster partnerships where we can make a difference and have a positive impact on the wider community and environment, and we believe in the value of giving back of our time, skills and resources.

GIVING BACK TO THE COMMUNITIES

In 2020 a three-year partnership was established with Crisis whose mission is to end homelessness in the UK for good and their work is founded on the belief that everyone should have a safe, stable place to live. We share the same belief and throughout the year colleagues from across the business have engaged in fundraising activities for Crisis including the Vida Summer Challenge and Vida Alternative Marathon and we fulfilled our commitment to contribute £150,000 to Crisis. We view our partnership with Crisis as an important part of our giving back to community and we will therefore continue our partnership over the long-term, we have also taken into consideration colleague feedback and from 2024 as well as supporting Crisis, colleagues can support charities or local community groups of their choice through the Give As You Earn scheme.

To support the wider community, everyone at Belmont Green is given a volunteering day and we want to support as many colleagues as possible to participate in giving back into their local communities, whether this is by using all or part of their volunteering day in one go, or an hour at a time. In 2023 44% of colleagues used their volunteering day, and our Culture Champions will continue to help to plan, facilitate, and promote community activities. Aligning with our hybrid working model we intend to broaden our range of community programmes to further support local initiatives.

Our community extends beyond our charity partners to our wider business community stakeholders. Maintaining open and effective relationships with the third-party business partners with whom we work forms an integral part of our business model and we are committed to undertaking sustainable procurement wherever possible and to developing this area as part of our ESG strategy.

SUPPLIERS

In 2023 our Outsourcing and Supplier Policy and approach to onboarding and due diligence were reviewed to embed ESG considerations and strengthen our supplier oversight. Management is responsible for the day-to-day success of the supplier relationships, with a robust governance and oversight model in place to ensure that key service levels and metrics are constantly monitored and reviewed. The Board Risk Committee receives periodic updates regarding our material outsource service providers to ensure it retains oversight and is satisfied that the relationships continue to add strategic value to the business.

During our supplier selection and due diligence process we consider whether the supplier has a good reputation, acts in an ethical manner and is socially responsible consistent with our values. As part of the due diligence process, we will consider if the supplier has an ESG plan or strategy, including its carbon emissions strategy, reporting and reduction targets and will request information on the suppliers' approach to equality, diversity and inclusion, modern slavery, labour practices and health and safety. Monthly relationship management meetings and quarterly reviews are conducted for our Class 1 and 2 suppliers.

We expect our suppliers to perform to the same standards of performance, culture, values and conduct as we expect of ourselves, and our new Supplier Code of Conduct was shared with our Class 1 suppliers in 2023.



£150K
 £150,000 DONATED TO CRISIS
 OVER A 3-YEAR PARTNERSHIP



44%
 OF COLLEAGUES UTILISED
 THEIR VOLUNTEERING DAY
 FOR COMMUNITY SUPPORT

ENVIRONMENT

We support the UK Government's pathway to Net Zero by 2050 and even as a small business we are conscious of the impact we have on the environment around us and that it is important that we act where we can, to minimise our contribution to climate change.

Our direct environmental impact through our own business operations is relatively low, however we generate carbon emissions indirectly through the properties on which we lend and our supply chain.

We have committed to reducing our scope 1 and 2 operational emissions by 50% from the 2019 baseline by 2030 and our strategy to achieve this reduction is embedded in our Agile Working Policy, ensuring that our business model uses the benefits of technology to enable effective communications without requiring significant travel. Where travel is required, colleagues should consider the most environmentally friendly way to reduce their carbon footprint, and walking, cycling or commuting by public transport are all actively encouraged. Season ticket loans are available to colleagues who rely on public transport to attend their work location.

Alongside this we have taken the opportunity to reassess our office space and have taken actions which will reduce the energy consumption at our Head Office.

We continue to seek to reduce the amount of waste we produce, by avoiding, re-using and recycling wherever possible. We have put in place a variety of strategies across the business to encourage colleagues help us be more sustainable. We do not use single use plastic at our Head Office, reusable mugs and water bottles have been provided, recycling bins have been installed and our Head Office waste is recycled, we aim to not send anything to landfill. We are also moving closer to a paperless environment; mortgage applications are processed on a paperless basis through to completion and all Board and

Committee papers are now shared and viewed via Diligent software. We will only procure FSC certified paper ensuring all the paper we use is sourced responsibly, demonstrating our commitment to responsible forestry and encourage key suppliers who print for us to do the same. Stationary, office equipment, clothing and marketing materials will be, where possible, purchased from ethical and sustainable sources.

During 2024 and beyond we will look more broadly at how we as an organisation can reduce our environmental impact. We will work with the owners of our office locations to ensure our waste is disposed of in an environmentally responsible way and investigate further initiatives that will reduce our emissions and help offset our carbon footprint. Since 2022 we have purchased carbon credits to offset our operational emissions and in 2023 184 Verified Carbon Units were purchased through Forest Carbon Limited and registered on The Verra Registry, supporting international projects.

As a responsible lender we realise that we can have a material impact on the energy use from properties subject to our mortgages including through our lending policies, product development and pricing. We will explore different options for monitoring this performance as part of our risk framework for managing their impact on climate change. We continue to monitor the consultations concerning the energy efficiency of domestic and non-domestic properties.

As part of our environmental strategy, we have committed to voluntarily reporting on scope 3 emissions and to improving the scope and accuracy of the data we publish each year. During 2024 we will look to engage with our key suppliers to better understand the emissions linked to the goods and services that we purchase and further develop our sustainable procurement approach to ensure that our suppliers' ESG strategies are aligned with our own goals.

We are committed to developing our climate-related reporting capabilities and disclosures in coming years and will continue to further enhance our understanding of what we need to do.

ESG GOVERNANCE

Operating within a robust governance and risk framework helps ensure that the decisions and actions we take are ethical, support good customer outcomes and align with our purpose and the delivery of our strategic objectives in a way which is consistent with our values.

The CEO has overall accountability to the Board to ensure that sustainable and responsible practices are embedded within the business including those associated with environment / climate. He is the senior manager responsible for ensuring the identification and management of financial risks arising from climate change under the Senior Managers and Certification Regime.

In relation to sustainability the Board is specifically responsible for:

APPROVING BELMONT GREEN'S VALUES AND CULTURE STRATEGY.

DEVELOPING, REVIEWING, AND MONITORING OF THE APPLICATION OF OUR CULTURE AND VALUES.

OVERSIGHT OF ANY STRATEGIC ELEMENTS RELATING TO ESG INCLUDING APPROVAL OF THE ESG STRATEGY.

REVIEWING OUR COMPLIANCE WITH RELEVANT CORPORATE GOVERNANCE CODES.

APPROVING THE ANNUAL MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT.

OVERSEEING AND MANAGING OF OUR OVERALL FRAMEWORK OF RISK MANAGEMENT.

OVERSEEING OF FINANCIAL REPORTING AND CONTROLS.

OVERSEEING OF FINANCIAL CRIME, INFORMATION SECURITY AND DATA PROTECTION.

APPROVING THE WHISTLEBLOWING POLICY AND REVIEW OF REPORTING.

SETTING OUR REMUNERATION POLICY AND MATERIAL CHANGES TO COLLEAGUE BENEFITS.

APPROVING MATERIAL OUTSOURCING OPERATIONS AND ARRANGEMENTS.

The Board Risk Committee is responsible for the monitoring and oversight of climate and transition risks.

The Board receives regular updates on our ESG progress and ESG considerations and metrics are set out in an ESG Scorecard which is aggregated into our overall Company Scorecard which is reported to the Board monthly and measures our performance as an organisation. Progress against the Company Scorecard is taken into account in determining directors' remuneration, bonus, and performance levels.

Other Executive Committees play a significant role in developing and overseeing the delivery of our ESG strategy. The Customer Committee focuses on customer and conduct matters and the Culture Committee people and culture matters including ESG and EDI. The ESG Forum and EDI Forum were established in 2021 and have cross functional representation and directly report into the Culture Committee, which reports to the Remuneration and Nominations Committee and to Board.

HUMAN RIGHTS

Belmont Green prioritises respect for all human rights, particularly emphasising non-discrimination, fairness, and privacy. These principles are crucial for our key stakeholders: customers, colleagues, and suppliers.

Operating solely in the UK, Belmont Green adheres to the Human Rights Act 1998, integrating the European Convention on Human Rights into UK law. We have established systems to ensure our operations align with all legal obligations and to identify any new or emerging requirements.

The responsibility for upholding human rights across Belmont Green lies with the Board and CEO. Our goal is to proactively manage potential negative impacts on human rights while fostering positive outcomes. This commitment is embedded in our employment, equality, customer treatment, and information security policies.

Our policies are designed to ensure compliance with UK laws and regulations by employees and business partners, promoting best practices. Our policies are formulated and kept up-to-date by the relevant business areas, authorised in accordance with the governance procedures and are communicated to all employees.

Our compliance with human rights regulation is integral to our overall compliance framework, and any breaches or potential breaches would be investigated and addressed through the Enterprise Risk Management Framework and, if appropriate, its disciplinary procedures. There were no cases of human rights investigations raised in 2023.

We comply with and support the objective of the Modern Slavery Act 2015, in raising awareness of modern slavery and human trafficking. Belmont Green is committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of the business and to acting ethically and with integrity in all business relationships. Belmont Green actively engages with suppliers to ensure compliance with Modern Slavery legislation is achieved. This commitment is reflected in our Supplier Code of Conduct.

Belmont Green publishes an annual Modern Slavery Statement, describing policies for ensuring compliance, which can be found on the Belmont Green website.

The company undertakes extensive monitoring of the implementation of all its policies and is not aware of any incident in which the organisation's activities resulted in an abuse of human rights or a breach of Modern Slavery legislation. No fines or prosecutions in respect of non-compliance with human rights legislation, including Modern Slavery legislation, have been incurred in the last financial year.

NON-FINANCIAL INFORMATION AND NON-FINANCIAL KEY PERFORMANCE INDICATORS

This section constitutes the Non-financial Information Statement, prepared in order to comply with Sections 414CA and 414CB of the Companies Act 2006. The information is provided by cross-reference:

REPORTING REQUIREMENTS	POLICIES AND STANDARDS WHICH GOVERN BGFL APPROACH	REFERENCE
ENVIRONMENTAL MATTERS	<ul style="list-style-type: none"> Environmental, Social and Governance Policy Credit Lending Policy 	Sustainability Report, Directors' Report, Risk Report
COLLEAGUES	<ul style="list-style-type: none"> Employee Handbook Agile Working Policy Equality, Diversity and Inclusion Policy Family Policy Health and Safety Policy Whistleblowing Policy Absence Management Policy V-Time Policy Disciplinary Policy Capability Policy Health and Safety Policy Grievance Policy Recruitment and Selection Policy 	Sustainability Report, Risk Report
SOCIAL MATTERS	<ul style="list-style-type: none"> Responsible Lending Policy Credit Lending Policy Customer Policy including Vulnerable Customers Arrears Management Policy Operational Resilience Volunteering Policy Complaints Policy 	Sustainability Report, Risk Report

REPORTING REQUIREMENTS	POLICIES AND STANDARDS WHICH GOVERN BGFL APPROACH	REFERENCE
HUMAN RIGHTS	<ul style="list-style-type: none"> Modern Slavery Statement Data Protection Policy Record Retention and Destruction Policy Supplier Code of Conduct Privacy Notices 	Sustainability Report, Risk Report
ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS	<ul style="list-style-type: none"> Anti-Bribery and Corruption Policy Anti-Money Laundering Policy Fraud Policy Conflict of Interest Policy 	Sustainability Report
STAKEHOLDERS	<ul style="list-style-type: none"> Outsourcing and Supplier Policy Disclosure Policy 	
GOVERNANCE	<ul style="list-style-type: none"> Committee Terms of Reference Financial Crime Framework Legal Framework Enterprise Risk Management Framework 	Corporate governance, Risk Report
DESCRIPTION OF BUSINESS MODEL		Business Overview
DESCRIPTION OF PRINCIPAL RISKS AND IMPACT OF BUSINESS ACTIVITY		Risk Report
NON-FINANCIAL KEY PERFORMANCE INDICATORS		Strategic Progress, Sustainability Report
SUSTAINABILITY INFORMATION		Sustainability Report