

2025 Modern Slavery Statement

This statement is published pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2025. It reflects the updated March–May 2025 Home Office Transparency in Supply Chains (TISC) guidance.

Redwood Bank is authorised by the Prudential Regulation Authority (PRA) and regulated by the PRA and the Financial Conduct Authority (FCA).

About Redwood

Redwood Bank (the Bank) is a UK-based specialist financial services provider, employing approximately 140 colleagues. The Bank's head office is located in Letchworth, with a second office in Warrington, and all operations are carried out within the United Kingdom. The Bank operates a predominantly outsourced operational model, supported by carefully selected third-party providers, enabling delivery of efficient lending and savings services to SMEs, charities and other organisations. This structure is underpinned by a strong governance framework to ensure that all partners meet the Bank's ethical, regulatory and operational expectations.

The Bank maintains a strict zero- tolerance approach to Modern Slavery. Given the nature of our business our inherent exposure to modern slavery and human trafficking risks remains low. Regardless, the Bank continues to take its responsibilities seriously and has strengthened processes year-on-year to promote awareness and mitigate risk within our operations and supply chain.

The Board and Executive Management continue to maintain open and constructive relationships with the FCA and PRA, underpinned by strong internal governance frameworks. This includes formal Executive and Board Committees and well-established speak-up channels through which any concerns relating to modern slavery, human trafficking or other ethical issues can be raised. These arrangements continue to play a central role in how the Bank oversees and monitors modern slavery risk.

Our Customers

With respect to Redwood Bank's customers, as part of our customer due diligence standards we look to identify and verify control and ownership structures for all entities, and complete appropriate ongoing monitoring. We undertake to:

- Conduct due diligence on our customers before onboarding, and on an ongoing basis.
- Ensure our systems can detect unusual activity, and to investigate customers that may be linked to modern slavery.
- Raise all suspicious activity reports to the Money Laundering Reporting Officer (MLRO) who will assess and determine if a report is required to be submitted to the National Crime Agency (NCA) in line with regulatory requirements.

Additionally, as part of our risk assessment process, we have factored in industry risk scores that may have an inherently higher risk for modern slavery and human trafficking. These customer risk scores then drive additional due diligence requirements and heightened ongoing monitoring.

People and Policies

The Bank is committed to maintaining a workplace culture founded on honesty, integrity and professional conduct. All our colleagues are encouraged and supported to raise concerns via multiple channels, with the Bank's Whistleblowing Policy providing a clear and confidential mechanism for reporting suspected wrongdoing.

To ensure the suitability and integrity of its workforce, the Bank undertakes comprehensive pre-employment screening for all new colleagues, carried out by an independent specialist provider. These checks include identity verification, financial crime screening, criminal record checks, references, right-to-work confirmation, and, where relevant, professional and educational verification. All new colleagues are required to complete mandatory regulatory and compliance training on joining, with annual refresher training to maintain understanding of the Bank's obligations.

The Bank maintains a suite of policies that define expected standards of conduct and underpin its zero-tolerance approach to modern slavery and human trafficking. These include a dedicated **Modern Slavery Policy**, the Colleague Handbook, Third Party and Outsourcing Policy, Whistleblowing Policy, Conflicts of Interest & Gifts and Hospitality Policy, and the Financial Crime Policy. Together, these policies reinforce the Bank's commitment to ethical behaviour, regulatory compliance and responsible supplier and operational oversight:

Modern Slavery Policy	Defines the Bank's overarching approach to preventing modern slavery and human trafficking, setting out clear expectations, responsibilities and controls to ensure these risks are identified, assessed and mitigated across the Bank's operations and supply chain.
Colleague Handbook	Documents the written statement of terms and conditions for all staff to adhere to and the expectations of all Bank staff in order to act with integrity and transparency
Third Party and Outsourcing Policy	Defines the Bank's approach to procurement and supplier management ensuring all material/outsourced suppliers meet Redwood Bank's expectations and regulatory standards
Whistleblowing Policy	Documents the Bank's commitment to its culture of transparency where all staff are openly supported and encouraged to report concerns and wrongdoings
Conflicts of Interest & Gifts & Hospitality Policy	Defines the approach the Bank takes to ensure it prevents detriment to the bank or its customers arising through conflicts of interest and received/provided gifts and/or hospitality
Financial Crime Policy	Documents the Bank's approach and framework to reduce or eradicate the risk of its staff, products and processes being open to abuse or risk of criminal activities including money laundering, terrorist activity, fraud, bribery and corruption, and modern slavery

Understanding our Supply Chain and Due Diligence

As a financial services provider with no manufacturing or retail activities, the Bank operates a relatively straightforward supply chain and maintains responsible, transparent relationships with its suppliers and expects them to meet the same high ethical and regulatory standards that underpin our own operations. The Bank applies a risk-based approach to supplier oversight, ensuring that modern slavery considerations are embedded into due diligence, contracting and ongoing monitoring processes. Our membership of the Hellios FSQS framework provides a standardised mechanism for assessing supplier credentials and identifying potential areas of risk, with due diligence outcomes and contractual terms reviewed at

onboarding and renewal by the Procurement team with any concerns are escalated to the Chief Operating Officer and to appropriate committees including the Board (if necessary).

Where suppliers are not assessed through the Hellios FSQS framework, the Bank applies a proportionate, risk-based manual due diligence process to ensure appropriate supplier oversight and alignment with the Bank’s ethical, regulatory and modern slavery standards.

The Bank also operates a **Supplier Code of Conduct**, which sets out the standards and behaviours expected of suppliers, including clear requirements relating to labour practices, human rights and modern slavery. Our suppliers are required to comply with this code as a condition of engagement, supporting a consistent and transparent approach to ethical sourcing.

Our Focus in 2025

During 2025, the Bank further strengthened its approach to identifying, assessing and mitigating modern slavery risk across its supply chain, recognising the importance of effective oversight in preventing harm and promoting ethical practices.

The Bank undertook a review of its full supply chain in 2025 to better understand where modern slavery risks were most likely to arise, enabling proportionate focus and enhanced scrutiny of those suppliers assessed as higher risk. This process is critical in supporting early identification of potential issues, improving transparency and ensuring appropriate mitigation measures are in place. Suppliers classified as potential high or medium risk will be required to undergo enhanced due diligence in line with Tier 1 and Tier requirements.

Suppliers - Modern Slavery Review	#	High Risk	Medium Risk	Low Risk
Total contracts reviewed in 2025	103	10	11	82

In addition, the Bank refreshed its Speak Up Champion arrangement, reinforcing an established mechanism by providing renewed visibility and support for colleagues to raise concerns, and further strengthening the culture of openness and challenge that underpins the Bank’s approach to modern slavery risk management.

Measuring Effectiveness

The Bank continues to measure effectiveness through defined Key Performance Indicators (KPIs) and supplier assessments. These are reported through various internal committees and to Board.

Indicator	Result	Comment
Reported modern slavery incidents	0	No confirmed incidents through 2025

Area	Measure	Result
Training & Awareness	Colleagues completing Modern Slavery Training	100%
Supplier Governance	Material and outsourced suppliers who meet threshold with published statement	100%

Looking ahead into 2026

In 2026, the Bank will continue to strengthen its approach to preventing modern slavery, with a focus on targeted, risk-based enhancements across its supply chain and governance framework. Key areas of focus include:

- Completing enhanced, risk-based due diligence for all suppliers assessed as potential high or medium risk, including the 21 suppliers identified through the 2025 supply chain review.
- Strengthening supplier engagement and accountability through enhanced risk assessment and Supplier Performance Annual Reviews.
- Maintaining 100% colleague completion of mandatory modern slavery training, with continued emphasis on risk awareness, early identification and effective escalation.
- Continuing to report modern slavery KPIs and management information to internal committees and the Board, ensuring appropriate oversight, challenge and continuous improvement.

Board Approvals

This statement was reviewed by the Bank's Executive Committee and approved by the Redwood Bank Board on 4th June 2026.

Gary Wilkinson
Chief Executive Officer
On behalf of:
Redwood Bank Limited
4th June 2026