



**This statement is made on behalf of Vida Bank Limited, trading as Vida Homeloans and Vida Savings (referred to as “Vida” or “the Company”) pursuant to section 54 of the Modern Slavery Act 2015.**

This statement was approved by Anth Mooney, CEO, following the filing of the Company’s annual accounts, and approved by the Board of Directors at its Board meeting on 28 May 2026.

Vida Bank Limited is registered in England and Wales, with the registered number 09837692 and registered office at 1 Battle Bridge Lane, London SE1 2HP. Vida Homeloans and Vida Savings are trading names of Vida Bank Limited. We are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority.

At Vida, we consider slavery and human trafficking to cover all forms of slavery, servitude, forced labour, human trafficking and exploitation for personal or commercial gain, in line with the definitions set out in the Modern Slavery Act 2015. This statement sets out the steps taken by Vida to ensure that slavery and human trafficking risk is managed in our business and supply chains.

### **Vida’s Business and Structure**

Vida is a UK based specialist mortgage bank. Vida was established as a specialist mortgage lender in 2015 and we received our banking licence in November 2024. We provide a range of competitive savings accounts, as well as offering specialist residential and buy-to-let mortgages. Our products are designed to be prudent and deliver good customer outcomes and are distributed under the “Vida” brand.

As at the date of the 2025 Annual Report and Accounts, Vida had assets of c.£3 billion and an annual equivalent turnover of c.£56million. We have over 13,000 live mortgage accounts, over 40,000 live savings accounts and employ just under 250 colleagues. Our head office is in London, and we currently have one other office in the UK, though we operate an agile working model.

### **Culture and Values**

The Company demonstrates respect for human rights and is committed to managing modern slavery and human trafficking risks in our business and in our supply chains. Our colleagues are committed to acting ethically and with integrity in all business relationships and to implementing proportionate and effective systems and controls to ensure slavery and human trafficking risk is managed in our organisation and in our supply chains.

Our culture and values reflect this – we aspire to be Visionary, Inclusive, Dynamic and Authentic in everything we do, and in doing so, we work hard to show how much we care as a business. This ethos drives the way we run our business and interact with our stakeholders every day.

## **Policies**

As part of ongoing initiatives to identify and mitigate risk, Vida has in place systems and policies covering our customers, colleagues and suppliers which aim to:

- **Identify and assess potential risk** areas in our business, mortgages and supply chain;
- **Monitor potential risk areas and mitigate the risk** of modern slavery or human trafficking taking place in our business, mortgages or supply chain;
- **Protect against funds containing proceeds of crime** obtained through modern slavery or human trafficking entering our business through strict money laundering safeguards; and
- **Enable whistleblowing** and protect the anonymity of whistle-blowers.

Our approach to modern slavery risk is to ensure that management of this inherent risk is considered across all business areas and relevant policies, including our Enterprise Risk Management Framework.

### *Lending policy*

Every property we lend on has a valuation (whether physical or digital), which ensures the property is suitable security. Specific lending conditions may also be put in place where appropriate. This include, for example, requiring appropriate licensing for houses of multiple occupancy, or imposing conditions on property improvements where needed. Where we become aware of modern slavery or human trafficking violations relating to a property which we have lent on or are intending to lend on, we will take appropriate action and support the authorities in any investigation.

### *Outsourcing and Supplier policy*

We have a comprehensive Outsourcing and Supplier Policy which governs our approach to working with external suppliers. The Policy and its related guidance set out or requirements for supplier selection, due diligence, risk assessment and contracting activities as well as ongoing supplier relationship management for our higher risk suppliers.

Our compliance with the Policy is monitored using agreed key risk indicators as part of our governance processes under the Enterprise Risk Management Framework.

### *ESG policy*

Our ESG Policy is reviewed and updated biennially and references our approach to managing modern slavery and human trafficking risk within Vida itself and sets out what action will be taken if any instances of modern slavery are found. Any instances of modern slavery or human trafficking affecting any employee should be reported to the HR team and where appropriate support can be provided. Breaches of the ESG Policy are reported through our governance structure.

### *People policies*

Our HR policies and employment practices are designed to ensure that all employees are treated fairly, respectfully and in accordance with applicable employment legislation. All employees are employed voluntarily, are free to leave employment subject to contractual notice, and recruitment is conducted through approved internal processes or reputable agencies, with appropriate due diligence undertaken. We operate transparent recruitment practices, carry out right-to-work checks, and we are committed to paying above the Government's national living wage to all colleagues directly employed by Vida. Our people policies promote safe working conditions and access to appropriate employee benefits, including enhanced paid leave entitlements, statutory and enhanced family leave where applicable, pension provision, and wellbeing support. We undertake regular monitoring and reviews of health and safety guidance, all people policies, and working from home practices, including through regular one-to-ones with line managers, colleague surveys and health and safety assessments. An Agile Working Policy has been well embedded to support colleagues, alongside our employee value proposition.

### *Whistleblowing Policy*

Our Whistleblowing Policy and supporting procedures ensure that concerns can be raised effectively, including those relating to modern slavery and human trafficking. All concerns are investigated, and individuals can notify appropriately trained colleagues (Whistleblowing Champions) where appropriate. A person may elect to remain anonymous in which case their identity is treated as confidential. Reports made under the Whistleblowing procedure are tracked by our Compliance team and reported through our governance structure. Our Whistleblowing Policy makes it clear that any individual raising concerns will not suffer any form of detriment or reprimand by Vida as a result and this is supported throughout the investigation procedures.

### *Financial Crime policies*

We are committed to the prevention of financial crime and, through risk-based internal procedures, policies, systems and controls, strive to ensure that high standards of crime prevention and awareness are maintained. Our Financial Crime Framework and associated policies set out the overarching principles and mechanisms which identify, mitigate and manage financial crime risk, as we seek to protect our customers and the Company.

## **Supply Chain Risks**

Vida does not manufacture or supply any goods. Our suppliers support our functions and the services provided to our customers, and consist primarily of IT services, professional services (for example, solicitors or accountants) and mortgage and savings administration services. We have a limited number of suppliers based outside the UK and none in high-risk jurisdictions. For these reasons, we consider the risk of the presence of modern slavery or human trafficking within our supply chains to be low.

We are committed to working with suppliers who act in an ethical manner and are socially responsible, in line with our Values. We manage the risk of modern slavery and human trafficking in our supply chain by:

- **Conducting due diligence checks** before entering into a contract, with specific consideration for the identification and monitoring of modern slavery and human trafficking risks. For example, we require confirmation that our high-risk suppliers' employees are paid a living wage, or that the supplier explains why not. We also ask our high-risk suppliers to confirm that they comply with relevant legislation and prevent modern slavery and human trafficking in their business.
- **Classifying suppliers** according to the risk and value associated with the service. This allows us to monitor and manage our supplier relationships in a way which is proportionate to the associated risk.
- **Including clauses in our contracts** where possible which require our suppliers to comply with applicable legislation and regulation.
- **Carrying out proportionate supplier management** and oversight throughout the relationship.

If we discover that a supplier is involved in modern slavery during the selection, due diligence or contracting process, the supplier will not be considered a suitable partner and will therefore be excluded from any selection process. If a supplier is found to be involved in modern slavery during the term of the supply arrangement, we will seek to terminate the relevant contract.

### **Training and Awareness**

We provide all colleagues with training, relevant to them and their role, including mandatory financial crime modules. We also offer online training on modern slavery and human trafficking in financial services, which emphasises the role of the financial services industry in combatting this risk, explains the different types of modern slavery, and gives detail on possible 'red flag' indicators. A short guide covering these areas is published internally and available to review at any time.

### **Next steps**

All relevant processes and policies, including in respect of modern slavery and human trafficking risks, will continue to be reviewed and where possible enhanced during the coming year as part of our continuous improvement initiatives. We will continue to work to ensure that policies and procedures are effectively embedded in the Company and risks are identified, carefully considered and monitored, and appropriately mitigated or managed.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Vida Bank Limited Slavery and Human Trafficking Statement for the financial year ending 31 December 2025.**

A handwritten signature consisting of the letters 'A' and 'S' in a cursive style, with a small dot at the end.

**Anth Mooney, Vida Bank Limited, 28 May 2026**