

## Starling Group

### 2024 Modern Slavery and Human Trafficking Statement

This statement has been published in accordance with Section 54 of the UK Modern Slavery Act 2015 (MSA 2015) which requires businesses to publish a statement setting out the steps they have taken to prevent modern slavery in their business and supply chains.

This statement sets out the steps taken by Starling Bank Limited and Starling FS Services Limited (together, the Group, Starling, We, Our, Us) and is for the financial year ended on 31 March 2024 (the year). This statement is a joint statement made by, and on behalf of, these two companies as they meet the thresholds required to publish a modern slavery statement under the MSA 2015.

#### **Our structure**

In the year under review, Starling Bank Limited (SBL) provided banking services in the United Kingdom to 4.2 million accounts across retail and small and medium-sized enterprises, with deposits of £10.97bn. Starling FS Services Limited, which is a wholly owned subsidiary of SBL, focused on the design, specification, build, test and implementation of software to support a mobile banking platform. Starling has offices in London, Cardiff, Southampton, Dublin and Manchester.

Starling takes a Group-wide approach to addressing modern slavery risks in its operations and supply chain. Starling's governance framework, which allows for the effective flow of information through appropriately structured executive and board level committees, is key to this approach. Key issues, including those related to human rights, modern slavery, human trafficking and whistleblowing may be raised through these channels to the Board of Directors (the Board). Relevant policies and due diligence procedures described in this statement apply across the Group.

#### **Our business**

Starling was founded to give people a fairer, smarter and more human alternative to the banks of the past. Starling's continued digital banking innovation drives it forward and bridges the gap between the customer, their finances and technology. Starling wants to change banking for good and that means it is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships. Starling has created a sustainable business model and aims to drive consistent profitable growth and capital generation while improving resilience to the wider economic environment. Starling's vision and mission are underpinned by five cultural values embodied by the Board, management and employees: listen, keep it simple, do the right thing, own it and aim for greatness. These values are a key driver of strategy and integrated across all practices into all functions of the Group, and reiterated through the Code of Conduct applicable to directors, all employees and agency staff.

Starling has a zero-tolerance approach to modern slavery and human trafficking, meaning it does not tolerate any form of slavery or human trafficking in its business operations or supply chains. Starling does not provide banking services to, or invest in, organisations that use excessive power to systemically promote behaviour that is harmful to individuals, groups or society as a whole in order to maximise their own profits. Starling acknowledges that these are real, yet hidden, issues in our society and, in a time of compounding crises, are likely to rise over the coming years.

Starling is committed to protecting human rights and preventing modern slavery and human trafficking by creating and continuously improving its systems and controls and improving our employees' understanding of these important issues. Starling supports government agencies, regulators, and law enforcement to help

identify and tackle modern slavery and human trafficking in the communities and environment it operates in.

## **Our supply chains**

Starling has a supplier base comprised of the following broad categories: financial market infrastructures including payment networks supporting UK and International payments, professional service providers such as business and strategy consultants, recruitment agencies, legal counsel, and training and insurance providers and other support service providers including information technology, market data, communications equipment, software and facilities.

Starling is committed to developing business relationships with high quality suppliers and partners who themselves are committed to operating under ethical standards and values equivalent to the Group's own, including in the fair treatment of customers, employees and other stakeholders. Starling takes a risk-based approach in identifying, monitoring and assessing suppliers who are at a greater risk. Starling recognises it may be exposed to greater risk when dealing with its suppliers, particularly those who have operations or suppliers in other territories, or through suppliers it has an indirect relationship with further down the supply chain.

Starling manages the risk of trafficking and slavery in the supply chain by:

- Predominantly utilising services from third-parties located in the United Kingdom, United States and Europe.
- Communicating to suppliers, contractors and business partners at the outset of the business relationship its zero-tolerance approach to modern slavery and human trafficking in our business and supply chain. This is reinforced on an ongoing basis with Starling's supply chain guidelines and policies shared periodically.
- Exercising skill, care and diligence when considering new material outsource providers and material vendors.
- Undertaking due diligence - including examining suppliers' policies and frameworks to ensure they are aligned with Starling's ethical standards and values and monitoring and managing its supplier base in line with Starling's Supplier and Outsourcing Policy and Third Party Management Procedure.
- Incorporating anti-slavery obligations into agreements with suppliers - including specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children - with suppliers where relevant and on a risk-assessed basis.

Our risks and controls are set out in further detail in the Starling Modern Slavery and Human Trafficking Policy.

The Board (supported by the Board Risk Committee) sets the control environment throughout the firm, including the appetite and tolerance levels in respect of outsourcing and third party risk management.

Maintaining high standards of business conduct is key to Starling, as such the Group's outsourcing relationships are regularly monitored. We recognise the importance of prompt payments to the cash flow of all businesses and the role it plays in mitigating exposure of workers to exploitation through late payment of wages. Our payment practices and performance are publicly reported on.

## **Our people and their training**

Starling has over 3,000 employees and is committed to providing a workplace culture that reflects our commitment to fairness, equity, inclusion, compassion and non-discrimination. Starling employees should be and feel safe from harassment and bullying and free to discuss concerns about Starling's operations internally to their line manager or externally without fear of consequences. This culture is supported by Starling's Whistleblowing Policy, which details a robust process to enable concerns of wrongdoing (including those related to modern slavery) to be escalated in a confidential manner so that the necessary investigation, remediation actions and reportings and/or notifications can take place. Further information on Starling's Whistleblowing Policy can be found under the 'Our Policies' heading below.

Management at all levels is responsible for ensuring those reporting to them understand and are given adequate and regular training on the issue of modern slavery and human trafficking in supply chains.

Starling has an open approach and operates regular, anonymised employee engagement surveys to ensure employees have a voice. Key themes arising from the results of these surveys are discussed with the Board. All employees undergo compulsory pre-employment background checks before joining Starling to, amongst other matters, identify any indicators that an individual may be a victim of, or perpetrator of, modern slavery or human trafficking. These checks, some of which are carried out by a specialist independent screening provider, include identity checks, financial crime checks, reference checks, right to work checks, criminal record checks and, if applicable, education and professional qualification checks. Employees are also subject to checks periodically during their employment, including, if applicable, visa checks. All new employees undertake mandatory training on modern slavery and human trafficking, economic crime, conduct risk and anti-money laundering and whistleblowing. Employees must refresh their training annually on these topics. Specialist teams, such as the risk and compliance team and customer service team, undertake additional training including on customer due diligence, complying with sanctions and fighting fraud. Completion rates are monitored by the Operational Risk Committee. Additionally, the customer service team is trained in identifying and supporting vulnerable customers and referring them to third party experts who can assist them.

Starling is an equal opportunities employer and ensures fair and full consideration of applications for employment from all people regardless of their age, gender, ethnicity, race or disability. Starling is committed to ensuring that its employees are paid fairly and Starling aims to attract and retain the best people from a diverse gender, social and ethnic background. The Staff Handbook and Code of Conduct sets out employees' rights and responsibilities to ensure everyone is conscious of their rights to sick pay, holiday pay, maternity / paternity pay and other benefits. In addition, Starling is a Living Wage Employer and is committed to paying its employees a wage that meets the costs of living, not just the Government minimum.

## **Our external engagement**

Starling is continuously developing the effectiveness of its risk and control framework to improve the capability to detect, disrupt, and prevent its customers and the wider public from exploitation. As part of this continuous improvement, Starling has engaged in external projects, including participation in a progressive public private partnership between the National Crime Agency (NCA) and six other UK banks committed to taking action against organised crime. Starling continues to invest resources as part of its membership in public private sector intelligence sharing across projects under the National Economic Crime Centre NECC including but not limited to a cell focused on tackling sexual exploitation. Starling also has representatives in more localised law enforcement projects focused on tackling all forms of modern slavery, human trafficking and organised immigration crime.

## **Our customers and partners**

Starling is committed to treating its customers fairly, ensuring their voices are heard and communicating with them in plain language that can be understood.

Starling carries out due diligence on all of its customers; personal, business and sole trader. Controls are built into its app to ensure the customer being onboarded is not associated with financial crime, including modern slavery and human trafficking. Starling adopts a proactive approach to identifying suspicious activity, and where necessary takes appropriate measures for customer accounts where such activity is flagged. Throughout the course of the year Starling has invested heavily in capability, capacity and technology in its efforts to detect and prevent financial crime. Further, it continues to actively engage with all relevant oversight bodies, including industry groups, in seeking to ensure that relevant information for the detection and prevention of financial crime is shared in a timely manner.

Economic and financial abuse are forms of control used by offenders during the exploitation of modern

slavery victims. As a Financial Abuse Code Signatory, we ensure that all colleagues that interact with our customers know how to recognise and respond in these vulnerable circumstances. We provide them with training and guidance, and our Welfare Support team is available to manage more complex and sensitive cases to adapt our services and offer signposting to specialist organisations in line with victim-survivors' additional needs. This includes the introduction of language translation support, to remove a communication and disclosure barrier for customers to speak to Starling directly that need support.

Starling expects all of its Marketplace partners to meet its business conduct standards. Starling requests a copy of the modern slavery statement of each of its largest Marketplace partners, both at onboarding and as part of annual due diligence reviews.

## Our policies

Starling's commitment to mitigating the risk of modern slavery and human trafficking within its supply chains is reinforced by the following policies.

Modern Slavery and Human Trafficking Policy	This documents Starling's approach to identify, assess and manage the risks posed by modern slavery and human trafficking. In addition, it demonstrates Starling's commitment to preventing slavery and human trafficking in its business and supply chains and clearly establishes expectations for its employees, agency staff, suppliers, Marketplace partners and other business partners.
Supplier and Outsourcing Policy	This defines Starling's approach to supplier management and outsourcing to ensure that suppliers and outsourced partners meet Starling's expectations and comply with regulatory requirements.
Staff Handbook and Code of Conduct	This applies to all Starling employees and fixed-term contractors. The Code represents Starling's commitment to how its employees work and conduct themselves at Starling. Starling strongly believes in acting in an ethical way and expects everyone it works with to uphold its values and principles in all that Starling says and does, as well as upholding all external legal and regulatory requirements and Starling's policies and procedures.
Whistleblowing Policy	This sets out Starling's commitment to a culture of openness, transparency and accountability where colleagues feel safe to raise concerns, and to comply with whistleblowing laws and relevant regulatory expectations. The Board Audit Committee (BAC) monitors the number of incidents raised through whistleblowing channels on a regular basis. Starling has partnered with an independent whistleblowing charity helpline and developed a solution that allows employees to anonymously raise any whistleblowing concerns. The Chair of the BAC is Starling's Whistleblowing Champion.
Financial Crime and Anti-Bribery and Corruption Policies	This is a series of multiple financial crime compliance policies, which detail Starling's approach to anti-money laundering, bribery and corruption, market abuse and sanctions. Starling's dedicated financial crime team monitors and reports any suspicious activity detected using Suspicious Activity Reports to be notified to the NCA.

## Looking ahead

Starling continues to look to improve its modern slavery controls in the workplace, including reviewing and developing its policies and procedures relating to modern slavery and human trafficking. The Operational Risk

Committee and Board Ethics and Sustainability Committee receives updates on any matters related to modern slavery and will continue to escalate any issues to the Board where necessary.

Starling is also committed to building on its employees' understanding of modern slavery and human trafficking by providing them with tailored information through its induction and refresher training programmes, including for directors. Starling's Intelligence Unit will continue to support and supplement this training through Group-wide sessions highlighting the importance of tackling modern slavery and human trafficking. The Intelligence Unit will also drive awareness on key calendar days, such as Anti Slavery Day on 18 October 2024, by partnering with leading external bodies.

Starling will also continue to strengthen its relationships with its external suppliers and partners, by continuing to engage with them on matters relating to modern slavery and human trafficking and ensuring their ethics and values meet Starling's expectations.

Further information on Starling's broader approach to managing environmental and social risks can be found here: <https://www.starlingbank.com/investors/2024/annual-report-2024/>.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. On 30 September 2024, it was approved by, and signed on behalf of, the Board of Starling Bank Limited and the Board of Starling FS Services Limited<sup>1</sup>.

Raman Bhatia  
Group Chief Executive Officer  
Starling Bank Limited

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<sup>1</sup> The signature of Starling FS Services Limited on the annual statement made pursuant to the Modern Slavery Act 2015 is available on request from Company Secretariat, Starling Bank Limited, 5th Floor, London Fruit and Wool Exchange, 1 Duval Square, E1 6PW.