

STARLING BANK LIMITED AND STARLING FS SERVICES LIMITED

2026 MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been published in accordance with Section 54 of the UK Modern Slavery Act 2015 (the **Act**). The Act 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 outlines the steps taken by Starling Bank Limited (**SBL**) and Starling FS Services Limited (**SFSSL**). We refer to the two companies together as **Starling, we** or **our**. It covers the financial year ended 31 March 2026 (the **year**), and is a joint statement, as both companies meet the requirements to publish a modern slavery statement under the Act.

Our structure

During the year, SBL provided banking services to 6.2 million people and businesses across the UK and held £12.7bn in deposits for its customers. SFSSL, a wholly owned subsidiary of SBL, focused on the design, specification, build, test and implementation of the software that supports the mobile banking platform.

We have offices in:

1. Cardiff;
2. London;
3. Manchester;
4. Southampton; and
5. Dublin.

Starling's governance framework allows for the effective flow of information. Our structure of committees at board and executive level allows key issues to be raised with and escalated to our Starling Group Holdings Limited Board of Directors, SBL Board of Directors and SFSSL Board of Directors, as appropriate (collectively, the **Board**). These issues include, but are not limited to:

1. human rights;
2. modern slavery;
3. human trafficking; and
4. whistleblowing.

Our governance framework is central to how we oversee modern slavery risks in Starling's operations and supply chain. The policies and due diligence procedures described in this statement apply across Starling.

Our business

Starling was founded to give people a fairer, smarter and more human alternative to the banks of the past. Our continued digital banking innovation drives us forward and bridges the gap between the customer, their finances and technology. We want to use technology and a human-centric approach to help customers gain active control of their finances through effortless everyday habits. We are committed to acting professionally, fairly and with integrity in all of our business dealings and relationships.

We have created a sustainable business model. We aim to drive consistent, profitable growth and generate capital, while making ourselves more resilient to the wider economic environment. Our vision and mission are underpinned by five cultural values embodied by the Board, management and employees:

1. Listen;
2. Keep it simple;

3. Do the right thing;
4. Own it; and
5. Aim for greatness.

These values drive our strategy and are integrated across all functions at Starling. Our Code of Conduct reiterates and embeds these values and applies to all directors, employees and agency staff.

Starling has a zero-tolerance approach to modern slavery and human trafficking. We do not tolerate any form of slavery or human trafficking in our business operations or supply chains, and we acknowledge that these are real but hidden issues in society.

We are committed to protecting human rights and preventing modern slavery and human trafficking. We do this by creating and continuously improving our systems and controls, and by improving our employees' understanding of these important issues through periodic training.

We take a proactive approach by:

1. **staying vigilant** — we actively monitor our supply chains for potential risks and red flags;
2. **sharing information** — we support and collaborate with the UK government, regulators and law enforcement to help identify and tackle modern slavery and human trafficking; and
3. **building awareness** — we educate our employees about modern slavery and human trafficking, empowering them to identify and report potential concerns.

Our supply chains

Starling's supplier base includes the following broad categories:

1. **technology** — cloud, software, data, IT communications and equipment;
2. **professional service providers** — legal and advisory, consultants, marketing and insurance;
3. **financial market infrastructures** — including payment networks supporting UK and international payments; and
4. **other support service providers** — including, non-exhaustively, facilities suppliers and recruitment firms.

We are committed to working with high-quality suppliers who share ethical standards and values aligned with [Starling's Ethics Statement](#). This includes treating customers, employees and other stakeholders fairly.

Starling takes a risk-based approach to identifying, monitoring and assessing suppliers. We manage the risk of trafficking and slavery in the supply chain by:

1. **clearly communicating our expectations** — we make our zero-tolerance approach clear to suppliers, contractors and business partners;
2. **carefully selecting new suppliers** — we exercise skill, care and diligence when considering new outsourced service providers and vendors;
3. **performing due diligence** — our approach to supplier management and oversight is codified in our Supplier and Outsourcing Policy, and involves gathering key anti-modern slavery and human trafficking information as part of our ongoing supplier due diligence assessment, including relevant policy and procedure documentation or confirmation that the supplier has a zero-tolerance approach to modern slavery and human trafficking; and
4. **seeking to include anti-slavery clauses in contracts** — we do this to prohibit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

The SBL Board (supported by the SBL Board Risk Committee) sets the control environment for the firm. This includes the risk appetite and tolerance levels for outsourcing and third-party risk management, in line with legal and regulatory standards.

Maintaining high standards of business conduct is crucial to Starling, and we monitor our outsourcing relationships closely. We recognise that prompt payment is essential to the cash flow of businesses of

all sizes — it helps ensure workers are paid on time and reduces the risk of exploitation. SBL's payment practices and performance are publicly reported, per statute. In 2025, SBL was awarded Gold at the Office of the Small Business Commissioner's Fair Payment Code Awards for paying at least 95% of suppliers' invoices within 30 days.

Our people and their training

Starling has over 3,800 employees. We are committed to providing a workplace culture that is:

1. fair;
2. equitable;
3. inclusive;
4. compassionate; and
5. free from discrimination.

Our employees should feel safe to raise concerns about Starling's operations without fear. This culture is supported by Starling's Whistleblowing Policy, which details our robust confidential processes for escalating concerns of wrongdoing, including modern slavery, and provides a framework for investigation, remediation, and notifications to take place. Starling is committed to conducting business with honesty and integrity, and we expect all employees to maintain high standards in accordance with Starling's policies, procedures and values. You can read more about the Whistleblowing Policy in the 'Our policies' section below.

We take an open approach to employee engagement. We run regular, anonymous surveys to ensure employees have a voice, and key themes arising from the results are discussed with the Board.

All employees undergo compulsory pre-employment background checks before joining Starling. These checks can spot signs that an individual may be a victim or perpetrator of modern slavery or human trafficking. We use a specialist independent screening provider for some of these checks, including identity, financial crime, referencing, right to work, and criminal record checks. Employees are also subject to checks periodically during their employment.

Starling recognises the importance of training to ensure our employees can identify the signs of modern slavery and act on them appropriately. All new employees undertake mandatory training, including on the following topics, and all employees refresh their knowledge every year:

1. insider risk;
2. anti-bribery and corruption;
3. tax evasion;
4. sanctions and proliferation financing;
5. modern slavery;
6. money laundering and terrorist financing;
7. fraud awareness and prevention; and
8. whistleblowing.

Specialist teams, such as the Risk, Compliance and Customer Service teams, undertake additional training on topics such as customer due diligence, complying with sanctions and fighting fraud. Completion rates are monitored by SBL's Operational Risk Committee. The Customer Service team is trained in identifying and supporting vulnerable customers, and can refer them to third-party experts for assistance.

The e-learning materials for modern slavery and human trafficking were enhanced in 2025, and guidance on handling exploitation, safeguarding and reporting was rolled out across Starling. Management at all levels are 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.

We are an equal opportunities employer. We give fair and full consideration to employment applicants regardless of their age, gender, ethnicity, race or disability. Starling is proud to be an accredited Living Wage employer. We ensure our employees are paid fairly, while aiming to attract and retain the best people with diverse mindsets, experiences and skills. You can read more about Starling's Staff Handbook and Code of Conduct in the 'Our policies' section below.

Our external engagement

Starling is continuously working to develop the effectiveness of our risk and control framework. This strengthens our ability to detect, disrupt and prevent the exploitation of our customers and the wider public. Examples of how we do this include:

1. **public-private partnerships** — we actively collaborate with public sector bodies and financial peers, including the strategic partnership between the National Crime Agency (NCA) and seven leading UK banks committed to disrupting organised crime, with key priority areas focused on combatting modern slavery, human trafficking and organised immigration crime; to directly support these operational targets, our Intelligence Unit actively participates in several time-limited operational cells;
2. **resource investment and NECC support** — direct resource allocation is deployed to support priority projects under the National Economic Crime Centre (NECC), strengthening collective capabilities against systemic financial crime threats; and
3. **data sharing and ECCTA 2023 implementation** — to champion the statutory data-sharing provisions established under Sections 188 and 189 of the Economic Crime and Corporate Transparency Act 2023, we engage in peer-to-peer intelligence sharing with other private banks while actively contributing to NCA Data Fusion working groups.

Our customers

At Starling, we are committed to:

1. treating our customers fairly;
2. making sure our customers' voices are heard; and
3. communicating with our customers in clear language they can understand.

Starling carries out due diligence on all its customers: personal, business and sole trader. We have also built controls into our app to make sure customers are not involved in financial crime, including modern slavery and human trafficking.

Starling takes a proactive approach to identifying suspicious activity and takes appropriate measures when it is flagged. We have invested heavily in capability, capacity and technology to detect and prevent financial crime, and we continue to actively engage with relevant oversight bodies, including industry groups, 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 train and guide all our customer-facing employees to recognise and respond to signs of these types of abuse. For more complex and sensitive cases, we have a dedicated Welfare Support team, which is able to adapt our services for victim-survivors and refer them to specialist organisations, in line with their needs.

We have also introduced language translation to support our customers, making it easier for them to communicate and share information with Starling directly when they need support.

We have enhanced key metrics to better understand Starling's exposure to modern slavery and human trafficking risks, from both a victim and perpetrator perspective, and to strengthen our monitoring approach. We have also built assessments into the Disclosures team's activities to ensure that reporting data and glossary codes are tracked effectively.

Our policies

The following policies support our commitment to preventing modern slavery and human trafficking in our supply chains. They are reviewed annually and signed off by the Board.

Policy	Summary
Group Modern Slavery and Human Trafficking Policy	Explains how we identify, assess, control, monitor and report the risks of modern slavery and human trafficking. It outlines Starling's commitment to preventing slavery and human trafficking in our business and supply chains, and sets clear expectations for our employees, agency staff, suppliers and other business partners.
SBL Supplier and Outsourcing Policy	Defines our approach to supplier management and outsourcing, ensuring our suppliers and outsource partners meet Starling's expectations and comply with regulatory requirements.
SBL Whistleblowing Policy	Sets out Starling's stance and approach to whistleblowing. It explains how we create a culture of openness, transparency and accountability, where employees feel safe raising concerns. SBL's Board Audit Committee (BAC) regularly receives whistleblowing reports summarising recent escalations, and our Whistleblowing Champion chairs the BAC. We have developed an internal solution so employees can raise concerns, and Starling has also partnered with an independent whistleblowing charity helpline that provides confidential advice at any stage.
SBL Anti-Bribery and Corruption Policy	Explains our approach to managing bribery and corruption risks. We take a zero-tolerance approach, act fairly and with integrity in all business dealings and relationships, and are committed to implementing and enforcing effective systems and controls to prevent bribery and corruption.
SBL Anti-Money Laundering Policy	Explains how we identify, assess and manage the risks of money laundering. Starling is committed to detecting and disrupting this crime, and has a dedicated financial crime team to monitor and report any suspicious activity using Suspicious Activity Reports to the NCA.

These key policies are supported by the following internal documents:

Document	Summary
Staff Handbook	Outlines rights and responsibilities so staff are aware of their rights to sick pay, holiday pay, maternity / paternity pay and other benefits. It applies to Starling's managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-time employees, agency staff and volunteers.
Code of Conduct	Represents Starling's commitment to how employees work and conduct themselves. Starling strongly believes in acting in an ethical way and expects everyone it works with to uphold our values and principles in everything they say and do, and to follow our policies and procedures, as well as all external legal and regulatory requirements.

Looking ahead

We will keep working to improve Starling's modern slavery controls in the workplace. This includes reviewing and updating our policies and procedures on modern slavery and human trafficking, particularly in light of business growth and expansion.

The SBL Executive Committee will receive updates on matters related to modern slavery and may escalate issues to the SBL Board, via our SBL Board Risk Committee, where relevant triggers and limits are met.

We are also committed to developing our employees' understanding of modern slavery and human trafficking. We will continue to provide tailored information through our induction and refresher training, which will apply to directors too, and our Intelligence Unit will continue to support and supplement our training efforts.

As part of our efforts to continually improve our modern slavery controls, Starling has identified areas for improvement in due diligence during onboarding and ongoing management. We have commenced a procurement and supplier risk transformation programme, which will span the 2026–2027 financial years and, among other things, will strengthen our approach to identifying and managing modern slavery- and human trafficking-related risks as we grow and engage a range of different suppliers, and embeds our zero-tolerance approach to modern slavery and human trafficking in our supply chain.

You can read more about Starling's broader approach to managing environmental and social risks in our [Annual Report](#).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

On 25 September 2026, it was approved by the Board of Starling Bank Limited and the Board of Starling FS Services Limited.

The signatures of Starling Bank Limited and Starling FS Services Limited on the annual statement made pursuant to the Modern Slavery Act 2015 are available on request from the Office of the Group General Counsel, Starling Bank Limited, 5th Floor, London Fruit and Wool Exchange, 1 Duval Square, E1 6PW.