

Introduction

Fleet Mortgages Limited's Modern Slavery Statement has been published in accordance with the UK Modern Slavery Act 2015 (the **Act**) and covers the financial year ended 31 March 2026 (the **reporting period**).

This statement outlines the steps Fleet Mortgages has taken to prevent modern slavery and human trafficking within its business operations and supply chains. These measures include risk assessments, due diligence processes, policies, employee training, and systems and controls designed to identify, assess and mitigate modern slavery risks.

Fleet Mortgages maintains a zero-tolerance approach to modern slavery, human trafficking, forced labour and all forms of human rights abuse. We are committed to conducting business ethically, responsibly and with integrity, having due regard for the wellbeing of our employees, customers and other stakeholders; and to continuously enhancing our approach to preventing exploitation wherever risks may arise.

We seek to deliver fair and positive outcomes through a culture built on strong values, accountability and responsible decision-making.

Business & Operations

Established in 2014, Fleet Mortgages specialises in providing non-regulated buy-to-let mortgages. Our customer base primarily comprises professional and semi-professional landlords, together with first-time landlords operating on a professional basis. We work closely with Independent Financial Advisers, mortgage networks, mortgage clubs and other regulated introducers.

Our head office is located in Fleet, Hampshire, with additional Workspaces in Cardiff and Manchester, supported by a number of field-based employees. We foster an inclusive and supportive culture and seek to attract and retain individuals who demonstrate our values and commitment to acting responsibly and ethically.

Starling Bank acquired Fleet Mortgages in 2021 and since that time has been the sole funder for all mortgage originations.

Policies

Fleet Mortgages takes a proactive approach to identifying and mitigating the risks of modern slavery and human trafficking across its business operations and supply chain.

Our policy management framework ensures that policies are regularly reviewed, maintained and updated by the relevant business areas. These policies are supported

through employee training and internal communications, ensuring colleagues understand the standards, behaviours and controls expected across the business.

Several of our policies directly or indirectly support the prevention of modern slavery and human trafficking and help ensure compliance with applicable legal and regulatory requirements.

HR Policies/Handbook

This suite of policies applies to all employees and contractors engaged by Fleet Mortgages. The policies set out the standards of conduct, behaviours and responsibilities expected of all staff and reinforce both our organisational values and legal obligations.

Recruitment Policy

This policy sets out Fleet Mortgages' approach to recruiting and onboarding employees and contractors. It details the pre-employment screening and verification requirements that must be completed before employment commences.

Whistleblowing Policy

Fleet Mortgages is committed to fostering an open, transparent and accountable culture. Throughout the reporting period, Fleet Mortgages maintained its own Disclosure in the Public Interest Policy and has since adopted the Starling Group Whistleblowing Policy.

These policies provide employees with access to confidential reporting channels through which concerns can be raised without fear of retribution. They support the objective investigation of concerns and provide a clear framework for escalation and remediation where required.

Third Party Selection, Due Diligence, Onboarding & Exit Policy

Since the end of the reporting period, Fleet Mortgages has adopted a new Third Party Selection, Due Diligence, Onboarding & Exit Policy. This policy further enhances our third-party oversight framework covering the onboarding, ongoing management, periodic review and offboarding of suppliers, introducers and other business partners. These enhancements are designed to strengthen our ability to identify, assess, monitor and mitigate a broad range of risks arising from third-party relationships, including those relating to modern slavery, human trafficking, financial crime, conduct and reputational risk.

Other Policies

Fleet Mortgages maintains a range of additional policies, including its Compliance Policy, Broker Management Policy, Anti-Bribery and Corruption Policy, Fraud Prevention

Policy and Financial Crime Policy. These policies support the oversight of third-party relationships and establish the controls required to comply with applicable legal and regulatory obligations.

Risk Assessment and Due Diligence

Recruitment

Fleet Mortgages assesses the risks associated with modern slavery and human trafficking within its employment practices and considers the residual risk in this area to be low, based on the controls and mitigants in place.

We maintain robust recruitment and onboarding processes which apply to all employees, contractors and temporary workers. As part of this process, individuals are subject to appropriate pre-employment screening before commencing work with the business.

These checks include verification of the individual's right to work in the United Kingdom, criminal record checks where appropriate, and employment reference checks. Fleet Mortgages is also committed to fair and transparent employment practices and maintains a clear and equitable approach to remuneration.

Lending Activity

Fleet Mortgages operates within the buy-to-let mortgage market and lends to professional and semi-professional landlords, together with first-time landlords operating on a professional basis.

The principal modern slavery risk arising from Fleet Mortgages' lending activities is indirect: the possibility that a mortgaged property could be used by a third party to facilitate exploitation. We seek to mitigate this risk through due diligence, source-of-funds checks and ongoing portfolio monitoring.

Prior to entering into a lending relationship, Fleet Mortgages undertakes due diligence on the applicant, the source of funds and the security property. These assessments are designed to identify and mitigate potential financial crime, conduct and modern slavery risks.

Where concerns are identified during the application process, whether in relation to the customer, property, funding arrangements or tenants, these are escalated, investigated and, where appropriate, reported through the relevant internal or external channels.

During the reporting period, one potential indicator of modern slavery was identified in connection with the tenant residing in the security property. The concern was investigated and assessed. Following a detailed review, although the circumstances

could not be conclusively verified, the matter was considered sufficiently serious to warrant external escalation and reporting. The case also provided an opportunity to reinforce awareness and validate the effectiveness of our internal escalation processes and has since been incorporated into our bespoke Modern Slavery training programme as a practical case study.

Fleet Mortgages also undertakes ongoing monitoring and periodic reviews of its existing customer base. Where potential concerns are identified, appropriate investigations are conducted and further action is taken where necessary in accordance with internal procedures and external reporting obligations.

Suppliers and Third Parties

Fleet Mortgages' supply chain is predominantly UK-based and concentrated in professional and business-to-business services rather than the higher-risk sectors or jurisdictions typically associated with modern slavery. Our principal supplier categories are IT and software providers, conveyancing firms, valuation and surveying firms, and facilities and office services, which we consider have a lower residual risk than certain other outsourced functions, such as those involving activities of a more manual or lower-skilled nature.

Detailed due diligence is undertaken before entering into relationships with third parties, with the level of assessment proportionate to the nature, complexity and risk profile of the relationship.

Third-party relationships are subject to ongoing monitoring and periodic review to ensure continued compliance with legal, regulatory and contractual requirements. Oversight may be conducted directly by Fleet Mortgages or through specialist third-party supplier management providers, including those used for conveyancing and valuation services. Our recently enhanced third-party oversight framework (introduced since the reporting period) further supports the timely identification of emerging risks and helps ensure third parties continue to meet Fleet Mortgages' expectations and standards throughout the lifecycle of the relationship.

Where due diligence, monitoring activities or periodic reviews identify concerns, Fleet Mortgages will investigate the matter, take appropriate remedial action and, where necessary, terminate the relationship. Any significant concerns, including those relating to modern slavery and human trafficking, will be escalated and reported through the appropriate governance and reporting channels.

Training

Fleet Mortgages recognises the importance of training in helping employees identify, escalate and respond appropriately to concerns relating to modern slavery and human trafficking.

Our dedicated training team provides employees with the knowledge and skills required to perform their roles effectively and to understand the legal and regulatory obligations applicable to their responsibilities.

Training is delivered through a combination of instructor-led sessions and e-learning modules, providing opportunities for both knowledge development and practical discussion.

All employees complete a structured induction programme designed to ensure a consistent understanding of Fleet Mortgages' policies, procedures and expectations. This is supplemented by role-specific training, including guidance on identifying and reporting concerns related to modern slavery and human trafficking where relevant to the role.

A dedicated modern slavery training module has been developed and implemented across the business to promote a consistent level of awareness and understanding amongst employees. The training supports the identification, escalation and reporting of potential concerns and forms part of Fleet Mortgages' broader commitment to preventing exploitation in all its forms.

Our Modern Slavery training programme for 2024-2025 achieved a 100% completion rate, with all in-scope employees successfully completing the training.

Plans for the Coming Year

Fleet Mortgages remains committed to continuously strengthening its approach to preventing modern slavery and human trafficking. We will continue to review and enhance our systems, controls, policies and procedures where opportunities for improvement are identified.

We aim to develop and maintain a framework of Key Performance Indicators (KPIs) and Key Risk Indicators (KRIs) to enable effective monitoring of modern slavery risks, measure control effectiveness, and drive continuous improvement across our operations and supply chains. Our Compliance and Quality Assurance activities will continue to provide oversight and assurance in relation to modern slavery and human trafficking risks. Where concerns are identified, these will be escalated and investigated through the appropriate governance channels.

Fleet Mortgages will continue to embed its enhanced third-party oversight framework and review its policies and procedures to ensure they remain effective, proportionate and aligned with applicable legal and regulatory requirements.

Employee training programmes will continue to be delivered and monitored to drive awareness and understanding across the business. Where opportunities are identified to enhance training content or improve colleague understanding, these will be incorporated into future training activities.

Fleet Mortgages remains committed to maintaining an ethical, transparent and responsible approach to business and to supporting the prevention of modern slavery and human trafficking across its operations and wider business relationships.

Approved by the Board of Directors of Fleet Mortgages Limited on: 17th September 2026

Signed:

Nicola Richardson, Director