

## **Tide's Modern Slavery Statement 2025**

This statement outlines the measures we have taken to identify and address potential risks of modern slavery in our business operations and supply chains during the financial year of 2025. Tide Holdings Limited ("Tide Holdings") issues this statement as the parent company of the Tide group ("Tide"). Tide Platform Limited ("Tide Platform") is the main UK operating entity subject to the Modern Slavery Act reporting requirement. This is Tide Holdings' fifth Statement on Modern Slavery and Human Trafficking, published in accordance with the Modern Slavery Act 2015.

While this statement is published to meet the reporting requirements of Tide Platform, it reflects the global policies, and commitments of the entire Tide group. Therefore, throughout this statement, 'Tide' refers to our collective global operations, unless a specific entity is otherwise named.

We believe that no business should be built on the exploitation of others. We are committed to establishing and enhancing our systems and controls to prevent slavery and human trafficking from taking place anywhere in our business operations and supply chains. This includes working to increase our employees' awareness of these practices which violate fundamental human rights. We also collaborate with regulators and law enforcement agencies to identify modern slavery and human trafficking in order to combat it in the communities and environments where we operate.

Tide is guided by the International Bill of Rights and supports the United Nations Universal Declaration of Human Rights and the fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, including freedom of association, the elimination of forced labour and child labour, and the elimination of discrimination in employment. Furthermore, our approach is aligned with the UN Guiding Principles on Business and Human Rights.

Section 54 of the Modern Slavery Act 2015 requires that organisations of Tide's size and structure publish a Modern Slavery Statement, or a parent/holding company may issue a group statement naming each subsidiary the statement covers. Since publishing our first statement, Tide has not received any reports from employees, the public, or law enforcement agencies indicating that modern slavery practices are taking place in our supply chain.

## About Tide

Tide's mission is to save time and money for small and medium-sized businesses (SMEs), so that they can get back to doing what they love, running their businesses.

By championing SMEs who represent the lifeblood of the economy, we're committed to helping them thrive and grow. Tide serves over 800,000 members in the UK, over 1 million members in India and has a growing member base following our launch in Germany and France. We have more than 2,500 employees (who we call Tideans) across our locations in the UK, in India, and across Europe.

Given the nature of Tide's business, we believe there is a low risk of modern slavery and human trafficking existing in our business operations or supply chains. However, we are not complacent. We take a strict, zero-tolerance approach to these real, yet often hidden, issues in our society.

Tide Platform's Board and the Executive Management Team maintain transparent relationships with the regulators, which ensures our strategic aims are in line with our regulatory obligations. Tide Platform's Board members are subject to the FCA's Senior Managers and Certification Regime Conduct Rules and are screened for Conflicts of Interest.

Our governance framework allows for effective flow of information through appropriately structured executive committees. Key issues, including those related to human rights, may therefore be rapidly raised through these channels to the Board.

We do not provide banking services or invest in organisations that use excessive power to systemically promote public behaviour which is harmful to individuals, groups or society as a whole.

## Our Key Values & Ethics

At the heart of our company are three core values: **Members First**, **One Team**, and **Data Driven**. These principles shape not only how we work together internally, but also how we engage with our members, vendors, and the wider community.

- **Members First** means we are committed to acting in the best interests of our members at all times. Their needs drive our decisions, and their wellbeing is central to our purpose.
- **One Team** reflects our belief in collaboration, respect, and accountability. We work together across departments, partners, and vendors to create a positive and ethical working environment for all.
- **Data Driven** underlines our commitment to making informed, transparent, and responsible decisions. We use insights to continuously improve and to identify areas where we can do better, especially in our ethical and social responsibilities.

We are passionate about supporting businesses and individuals in a way that is grounded in strong ethical principles, upholds human rights, and promotes fairness, dignity, and opportunity. These values are embedded in our culture and guide us in identifying, preventing and addressing the risks of modern slavery and exploitation in any part of our operations or supply chains.

We believe that ethical business is good business, and we refuse to compromise on human rights. We are committed to ensuring that everyone connected with our organisation is treated with respect and fairness.

The following sections show how these values translate into our approach with our employees, our members, and the third parties we work with.

### **Our Employees: Tideans**

We are dedicated to treating all employees fairly and equally, helping them to perform at their best. Our goal is to have clear rules and procedures so that all Tideans act with the highest standards of conduct and know exactly what is expected of them.

Our culture is one where employees treat their colleagues with dignity and respect, creating a truly inclusive environment. We do not tolerate discrimination, bullying, or harassment on any grounds, as outlined in our Code of Conduct, Disciplinary Policy, Procedure Policy on Prevention of Sexual Harassment at Workplace, and other related policies.

Empowering our people to speak up is a cornerstone of our culture. We strive to maintain a culture where our employees can raise concerns without fear of retaliation. We encourage feedback and provide effective and confidential channels for employee complaints,

including our Whistleblowing Policy and procedures, which include access to a dedicated helpline to protect the identity of whistleblowers, managed by Syntrio.

Tide's Financial Crime Policies apply to all members, employees, and third parties, including vendors. These policies cover all financial crime types, including fraud, bribery and corruption, tax evasion, sanctions, money laundering, and terrorist financing. They are designed to mitigate the risk of initiating or continuing relationships with account holders or entities involved in criminal activity.

We recognise that our services may be targeted by bad actors to facilitate financial crimes which are connected to the predicate offences of modern slavery and human trafficking. We design our systems and controls to detect, disrupt and report potential instances of modern slavery and human trafficking moving through our business.

## **Training & Development Programme**

Equipping our frontline: We are dedicated to continuously training our employees to ensure they have the necessary tools and knowledge to be effective in their roles. All new Tideans receive financial crime training, which is refreshed annually. We also provide training conducted by external experts to help our teams identify signs of abuse in our member base.

Our commitment includes:

- **Comprehensive Training Programmes:** We provide regular training for all employees which is mandatory and covers case studies, identification techniques, and reporting procedures. This includes human trafficking as a predicate crime to ensure staff are aware of how this underpins the offence of money laundering.
- **Continuous Development:** We regularly update our training materials with the latest information and best practices. All training material is reviewed annually to support continuous development.

We will continue to review our efforts to combat modern slavery and human trafficking, as well as the controls and monitoring systems in place, and remain dedicated to making the necessary improvements to our policies and practices.

## Measuring Effectiveness

Area	Metrics	2024 Result	2025 Result
Training	% of colleagues who completed financial crime training (including reference to human trafficking)	100%	100%
	% of colleagues who completed targeted modern slavery training	Not Reported <sup>1</sup>	96% <sup>2</sup>

<sup>1</sup> Targeted modern slavery training was active in 2024, but this metric was not formally reported in our previous statement. We have introduced this metric for 2025 to enhance transparency.

<sup>2</sup> Data as of 10 February 2026. This metric reflects targeted training assigned via our Learning Management System (LMS), with 791 out of 825 employees completing the module. The remaining incomplete records primarily relate to colleagues on long-term leave (e.g., maternity) or those still within their standard one-month completion window.

## Our Customers: Tide Members

Tide verifies every member's identity and assesses their risk profile when they join, and we continue to monitor this over time. If we detect signs of increased risk or suspicious activity - including relating to modern slavery - we carry out enhanced checks and take action in line with our legal obligations.

Modern slavery and human trafficking are serious crimes, and any financial gains from them are treated as criminal proceeds. At Tide, we are fully committed to preventing our services from being used to facilitate or support such activity.

We're also continually strengthening and enhancing our Financial Crime Framework to ensure our teams have the tools and training needed to identify and prevent financial crime, which includes modern slavery and human trafficking.

Over the past twelve months, we have continued to improve our financial crime framework and controls, ensuring that we are fully compliant with our regulatory obligations and protecting our members.

We have driven meaningful change to:

- Evolve our global and local financial crime risk assessments to better pinpoint and articulate the specific modern slavery and human trafficking risk exposures inherent to Tide's business model.
- Develop our global financial crime approach so that KRIs and jurisdiction-specific data relating to modern slavery and human trafficking are regularly tracked, reported and escalated through established governance routes.
- Strengthened data validation for all reported metrics to ensure our published data remains robust and accurate.

### Measuring Effectiveness

	Number of MS & HT SARs <sup>1</sup>	
Area	2024	2025
Suspicious Activity Reporting - related to modern slavery & human trafficking	4 <sup>2</sup>	6

<sup>1</sup> UK member-related

<sup>2</sup> The 2024 SAR volume has been restated from 6 to 4 to correct a prior reporting inaccuracy. Enhanced data validation controls are now in place for published metrics.

### Our Third Parties: Partners, Vendors and Outsourcing

Tide is dedicated to establishing strong business relationships with high-quality vendors and partners who uphold ethical standards that are equivalent to Tide's own. This includes the fair treatment of customers, employees, and other stakeholders. Tide primarily uses services from third parties in the United Kingdom, Europe and India.

To address trafficking and slavery in the supply chain, we:

- **Have high expectations in our partner relationships.** These are our deepest and most important third-party relationships. Tide ensures that all partners meet the high standards we uphold as a company. We verify that modern slavery statements are in place with our strategic partners both during onboarding and on an ongoing basis.
- **Carry out due diligence and oversee relationships** in line with our Outsourcing and Third-Party Risk Policies and relevant procedures. This helps us ensure that third parties meet, and continue to meet, Tide's expectations.

Material outsourcing decisions are made by the Board on the recommendation of the Board Risk & Compliance Committees, and the materiality of Tide's outsourcing relationships are regularly monitored. Upholding high standards of business conduct is crucial to Tide, and we do not engage with third parties that violate labour laws.

### **Checking our Progress on Our Modern Slavery Commitments**

Holding ourselves accountable: We are committed to continually reviewing the steps we are taking, as well as the controls and monitoring systems we have in place, to combat modern slavery and human trafficking. In previous statements we have made commitments in this regard, and the below is an update on our progress.

Since publishing the last statement, our Internal Audit function finalised its detailed review of Modern Slavery controls and shared findings to strengthen Tide's control environment. We will continue to drive forward the opportunities identified as part of this Audit exercise to strengthen our approach to proactive risk management when it comes to modern slavery and human trafficking.

Regarding the commitments we made in our 2024 statement, here are updates on our progress:

In 2025, We Committed to	Where We Are	Our Next Steps
<p>Continue to improve our approach to <b>screening for Human Trafficking and Modern Slavery risks in our third-party risk management</b>, and in particular ensure we can evidence third-party approaches to these risks wherever a relevant activity is being outsourced by Tide.</p>	<p>During 2025 we improved the consistency and depth of checks we conduct on all material third parties during onboarding and contract renewal, including questions relating to Human Trafficking and Modern Slavery. We also made improvements to the underlying process.</p>	<p>We are in the process of</p> <ol style="list-style-type: none"> <li>1. Implementing a single system which will manage the onboarding and renewals of third parties, and</li> <li>2. Improving the sophistication of how we assess the relative Financial Crime risks (including Human Trafficking and Modern Slavery) of all third parties in Tide.</li> </ol>

<p>Continue to <b>strengthen our financial crime framework and internal control environment</b>, which includes proactively investigating our member base. The dedicated Financial Crime team will focus on members operating in high-risk industries or working with vendors in jurisdictions linked to human trafficking and modern slavery to ensure we are identifying and reporting suspicious activity.</p>	<p>We have made strong foundational progress in detecting unusual behaviours and patterns. At the same time, our Financial Crime team has actively contributed to a public-private partnership focused on organised immigration crime which, while distinct, presents tangential insights to human trafficking, helping to develop new industry typologies.</p>	<p>We remain committed to strengthening our financial crime framework by continuously refining our detection capabilities, with a focus on suspicious behavioural patterns, including those potentially linked to modern slavery and human trafficking. We will integrate any insights gained from our public-private partnerships to enhance our internal controls, enabling more targeted reviews of members operating in high-risk industries and jurisdictions.</p>
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In terms of future commitments, Tide will:

1. **Continue to mature our control environment** to support proactive risk management of Modern Slavery and Human Trafficking risks. We will drive this by embedding comprehensive MSHT requirements directly into our Global Financial Crime policy, alongside refining our existing methodologies to better capture high-risk industry sectors, updating our training, and enhancing our ability to identify modern slavery risks before they materialise.
2. **Build on our strong ethical culture** by explicitly linking modern slavery and human trafficking risks to our internal Speak Up channels, empowering staff to raise concerns. Externally, we are fulfilling our prior commitment by publishing our first

MSHT-themed blog post alongside this 2025 statement. Going forward, we will maintain an annual publication cadence to drive continuous awareness. Together, these actions actively reflect our human rights commitments both internally and externally.

3. **Elevate our third-party risk assessment framework** to more intentionally capture human trafficking risks alongside modern slavery. We will achieve this by updating our vendor due diligence questionnaires to explicitly assess suppliers on human trafficking indicators. As we continue to mature our risk-based approach, we will also evaluate the implementation of targeted anti-slavery clauses within our contracting lifecycle, ensuring our due diligence processes and mitigating actions are strengthened and consistently applied to vendors presenting higher risk.

As above, we will monitor and update our progress in meeting these commitments in future statements.

### **Board Approval**

This statement was approved by the Board of Directors of Tide Holdings Limited on 30 April 2026.

Oliver Prill

CEO