Introduction

The NewDay Group (being NewDay Group UK Limited and its subsidiary undertakings, collectively “NewDay”) aims to act fairly, ethically and openly in everything that it does. We are committed to carrying out our business responsibly, and this includes ensuring that slavery and human trafficking are not taking place in any part of our business or supply chain. The requirements of the Modern Slavery Act 2015 (the “Act”) aim to work towards eradicating modern slavery in commercial organisations with business operations in the UK. NewDay fully supports this goal.

This statement, which has been approved and published by NewDay Cards Ltd and NewDay Technology Ltd (the NewDay subsidiary undertakings required to publish such a statement), provides details of the steps that we have taken as a business towards ensuring that slavery and human trafficking are not taking place within our organisation or within our supply chain for the financial year ended 31 December 2025.

Organisation structure and supply chains

Our structure: In September 2025, Cinven and CVC Capital Partners (CVC) agreed to sell NewDay’s portfolio of consumer credit receivables to funds managed by KKR (the “KKR acquisition”), a leading global investment firm. This resulted in KKR-managed funds acquiring the entire share capital of NewDay Group (Jersey) Limited, the ultimate parent undertaking of NewDay prior to KKR acquisition (the “predecessor NewDay group”). Immediately prior to the KKR acquisition, certain subsidiaries and subsidiary undertakings of NewDay Group (Jersey) Limited were carved out of the predecessor NewDay group to create a standalone origination and servicing group (“OpCo”). As a result, NewDay Group (Jersey) Limited together with its subsidiaries and subsidiary undertakings comprised a consumer receivable asset group (“AssetCo”).

NewDay Group UK Limited is the parent of the group of companies forming OpCo which manages the consumer accounts of AssetCo. The underlying portfolios of consumer credit receivables continue to be originated by NewDay Ltd and serviced by NewDay Cards Ltd – both of whom are Financial Conduct Authority (FCA) regulated – with beneficial title to the consumer credit receivables owned by

AssetCo. As part of the KKR acquisition, the Company entered into a multi-year origination and servicing agreement to sell the beneficial title of newly originated accounts to AssetCo.

Our business: NewDay provides an end-to-end technology platform, together with origination and servicing capabilities, across the full unsecured credit product lifecycle from acquisition through to servicing and collections. We originate and service consumer credit receivables, both directly to consumers through a number of own brands (e.g., Aqua, Marbles, Fluid and Bip) and on behalf of retailers including John Lewis & Partners, Argos and AO. Our technology platform is highly scalable and integrates into customers' existing technology architecture to support their retail sales ambitions through the provision of credit, loyalty and other promotional programmes. We had 1,305 employees as at 31 December 2025.

Our supply chains: We work with approximately 370 third-party suppliers, the majority of which are based within the UK or the European Economic Area, with a small number operating from the United States and India. Our supply chain is made up of direct third-party suppliers who supply us with products and/or services which, in turn, help us to deliver services to our customers, clients and employees. Our suppliers use their own supply chain to deliver services to us, and thus we believe it is important that they share our commitment to combating modern slavery and human trafficking both within their own organisation and when overseeing their own third-party supply chain.

Policies in relation to modern slavery and human trafficking

Our commitment to combating modern slavery and human trafficking is embedded into our policies. Our policies have been designed to take account of the requirements of the Act, including:

- our employment policies and procedures covering our obligations as an employer;

- our Code of Ethics and Integrity policy outlining our expectations regarding honesty and integrity, and stating that standards of conduct must be aligned with NewDay's Purpose and Values. Our Values are core to the way we work and set the behaviours and standards we expect from our employees;
- our commitment to fully supporting human rights. All aspects of our operations and, where material, our policies are guided by the Human Rights Act 1998 and the International Labour Organisation (ILO) core standards;
- we have robust and confidential whistleblowing procedures in place, underpinned by a Board-level Whistleblowing policy to allow employees and stakeholders to raise concerns about any aspect of our business practices;
- our Procurement policy detailing the need to understand our supply chain risk, use best practice in the application of ethical standards and comply with relevant legislation;
- our supplier frameworks specifying the supplier on-boarding due diligence required as well as ongoing monitoring requirements; and
- all of our employment policies and procedures are underpinned by our Board-approved People policy, which outlines our commitment to fulfilling all of our obligations as an employer in line with all relevant UK employment and equality law requirements and best practices.

Risk assessment and management

We carry out annual checks to ensure our employees' salaries are in excess of minimum wage requirements, together with ongoing checks to validate that benefits taken through salary sacrifice do not bring an employee's salary below the minimum wage.

We have put in place robust processes that aim to ensure we only work with appropriate suppliers who can meet the standards expected of them. Our primary supply chain focus is on areas of supply which potentially carry a higher risk, for example our sub-contracted workforce. Our general supplier risk assessment also allows us to understand and focus on our suppliers with operations in higher risk locations, particularly emerging economies and less developed countries.

Where we enter into a contract with a new supplier on our standard terms and conditions, these require the supplier to comply with all applicable laws, which includes the Act. Furthermore, we also require the supplier to contractually comply with our Supplier Code of Conduct.

Our Supplier Code of Conduct, encourages consistent behaviours and practices within our supply chain. It requires suppliers to support freely chosen employment – that is completed voluntarily and without slavery, forced or compulsory labour and human trafficking, irrespective of the industry or location of the supplier. Potential new and existing suppliers can view our Supplier Code of Conduct via our company website (newday.co.uk/site-services/supplier-code-of-conduct/). All new suppliers are asked to confirm they have read and comply with our Supplier Code of Conduct when registering on NewDay's procurement system. This process is also carried out for existing suppliers as part of our on-going supplier reviews.

Due diligence processes

Our supplier on-boarding due diligence process makes specific reference to the Act and its requirements. It requires suppliers to confirm if they have their own modern slavery statements or, if not applicable, confirm they have policies and/or training in place to ensure that appropriate and coordinated action is taken throughout their business to ensure their business and supply chain is slavery free. This supplier on-boarding due diligence applies to all supplier relationships regardless of the industry or geography in which they operate.

We carry out annual reviews to ensure that our material suppliers continue to adhere to our standards using a combination of annual supplier attestations, desktop assurance and on-site assurance visits. The required supplier attestations specifically reference the Act and its requirements. Any risks identified are escalated, reported and managed in accordance with our supplier risk management procedures.

Training on modern slavery and human trafficking

Our Procurement team and key stakeholders involved in supplier management complete annual CIPS (Chartered Institute of Procurement & Supply) ethical procurement training to ensure competence in monitoring our adherence to the Act and compliance with this statement.

Key Performance Indicators

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Measure	Current assessment	Future action
Procurement training and awareness.	Requirement to read the Code of Ethics and Integrity policy as part of employee induction. Annual CIPS ethical training is conducted. This provides comprehensive training on coverage and control of modern slavery risks in our supply chain demonstrating our commitment to ethical procurement and supply practices.	Continued review of colleagues requiring training in order to ensure the Sourcing and Supplier Manager community are familiar with modern slavery risks.
Frequent review of associated and related policies.	Policies are categorised by level according to our governance processes and are subject to review in line with the frequency outlined for the policy level.	Continuing our review of policies.

Evaluation of suppliers before they are on-boarded into our supply chain.	Supplier attestation process in place to confirm commitment to our Supplier Code of Conduct (published on our website) for all new suppliers. Our supplier due diligence questionnaire includes questions specific to the Act.	Our Supplier Code of Conduct is continually reviewed alongside the supplier risk assessment process to identify supply from high risk countries.
Review existing suppliers regularly, according to risk.	Supplier attestation process implemented to collect commitment to the Code for all existing suppliers. Material/key suppliers are subject to annual or bi-annual review as defined by our supplier risk framework. Our less critical providers are reviewed periodically depending on their risk profile. We have an independent and centralised supplier assurance programme.	Continue to track and ensure corporate targets are met or exceeded. Continue to develop our supplier assurance processes.
Ensure expectations for suppliers are clearly communicated and contractually defined.	New contract clauses ensure our Supplier Code of Conduct can be contractually enforced if necessary, including modern slavery, allowing us to work with our vendors more closely to	Continue ensuring that our contracts are robust and effective in managing this risk.

	ensure that this risk, amongst others, is sufficiently mitigated. Legacy material suppliers will be remediated at contract renewal.	

Conclusion

We are committed to helping combat modern slavery and human trafficking within our business and supply chains.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes NewDay's modern slavery and human trafficking statement for the financial year ended 31 December 2025. The statement was approved by the Board of Directors of NewDay Cards Ltd and NewDay Technology Ltd and signed on their behalf by:

Anthony Godsiff
Chief Financial Officer
28 July 2026