

Anti-Slavery Statement for financial year ending 31 March 2025

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to prevent modern slavery taking place in any part of our business or in our supply chains.

Our organisation structure and supply chains

We aim to build long-term relationships with all our customers and to offer a broad range of exceptional and personalised financial services and expertise to our customers.

To provide these, we procure a range of goods and services from third-party suppliers who may, in turn, enter sub-contracts with their suppliers. We may also, from time to time, outsource some of our non-customer facing functions to suppliers.

We conduct our business guided by our core values – excellence, empathy, honesty, and social responsibility – and our purpose to be good bankers and good citizens. We recognise this can only be achieved by addressing the interests of our key stakeholders, which includes the wider community in which we operate, and by addressing risks throughout our supply chain, including in relation to modern slavery.

As part of our initiative to identify and mitigate risk, we make clear to our suppliers our expectations of business behaviour and, where possible, we build long standing relationships with them.

Our policies in relation to modern slavery and human trafficking

We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls prevent modern slavery in our supply chains or in any part of our business. Our Anti-Slavery & Human Trafficking Policy reflects this commitment.

Our Chief Risk Officer is responsible for overseeing the implementation of our Anti-Slavery and Human Trafficking Policy and the annual preparation of our modern slavery statement.

Our due diligence processes for modern slavery and human trafficking

To monitor potential risk areas in our supply chains on an ongoing basis, we carry out due diligence for all of our supplier engagements and periodically refresh the due diligence to ensure that, where applicable, our suppliers meet our expectations for managing the risks relating to Modern Slavery.

Risk assessment and management

We expect all those in our supply chain to comply with our values and ethics. To this end, in addition to the ongoing due diligence discussed above, we have the following measures in place:

- We have developed a risk assessment methodology to assess the risk of modern slavery occurring in our supplier engagements. When a new supplier is on-boarded we carry out a

risk assessment of that supplier - which requires the supplier to complete a questionnaire and to provide us with a copy of their own modern slavery policy and, if applicable, published modern slavery statement.

- For higher risk suppliers, and where the contract for such suppliers meets the criteria for Legal Counsel Review, we include the supplier's Modern Slavery rating from the service risk assessment in the Contract Review Request. This enables Legal Counsel to evaluate and incorporate appropriate contractual obligations related to Modern Slavery.
- We maintain a policy, and supporting systems, to encourage internal reporting of concerns, ensuring protection of whistleblowers. Additionally, our expectations regarding Modern Slavery are set out in our 'Supplier Charter,' which is shared with all new suppliers and reissued at each due diligence refresh.

Training on modern slavery and human trafficking

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we provide annual training to all staff.

Measuring our effectiveness in combating modern slavery and human trafficking

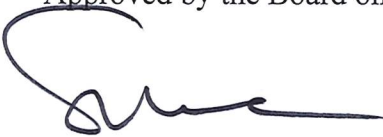
To date, we have not discovered any violations of our Anti-Slavery Policy.

If we discover a violation of our Anti-Slavery Policy, we will respond in a manner proportionate to the nature and extent of the violation. Serious violations will require immediate and decisive action and may result in the termination of the business relationship. For less serious violations, we will allow the supplier reasonable time to develop and implement a plan for remediation.

We have established a dedicated strategic sourcing and supplier management department and are committed to enhancing the strategic sourcing and supplier management tools operated by the department. We have established and are committed to maintaining, relationship owners for and regular engagement with our critical suppliers. These interactions with key suppliers give us continued confidence in the robustness and integrity of our critical supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31st March 2025.

Approved by the Board on 18 June 2025.



SIGNATURE (SIMON HOARE)

Partner

Date 18th June 2025