

Hampshire Trust Bank PLC and its subsidiaries (“HTB Group”) Modern Slavery Statement for the Financial Year 2025

Introduction

The Board of Hampshire Trust Bank PLC (“HTB”) fully supports the objectives of the Modern Slavery Act 2015 (“MSA”) and is committed to acting ethically and with integrity and transparency in all business dealings, and to implementing effective systems and controls to safeguard against any form of modern slavery taking place within our business or our supply chain. HTB Group has zero tolerance to slavery and human trafficking. HTB Group will take all necessary steps to ensure that it does not engage in any business activity with a third-party organisation which engages, or is believed to engage in, people trafficking, slavery, forced labour or domestic servitude. This statement covers our direct operations and supply chains. It also looks at the steps we are taking to combat the risk of modern slavery and human trafficking within our business, our clients and customer base.

Our Organisation

HTB is a UK based specialist bank headquartered at 80 Fenchurch Street, London. Our business model focuses on providing deposits and tailored lending services, combining specialist expertise with robust risk management practices. We operate within the United Kingdom, through direct channels and a network of brokers. Our core business lines include:

- Development Finance;
- Specialist Mortgages, including Bridging Finance;
- Wholesale Finance;
- Savings Products.

Our operations are supported by strong governance frameworks and compliance with UK regulatory standards. We maintain a customer centric approach while ensuring that our supply chains and outsourced services align with our ethical and legal obligations.

Our Approach

Suppliers

Risk:

Overall risk for HTB Group related to Modern Slavery Act compliance is deemed to be low, for the following reasons:

- The Group is UK based and operates in the field of financial services.
- Our supply chain is limited to goods and services necessary to support an organisation of this nature (e.g., support services and computer hardware/software).
- We have a commitment to seeing UK standards in our supply chain and our due diligence and governance programme supports this aim.
- Our external suppliers are mostly UK based companies in low-risk sectors.

Due Diligence:

HTB Group operates a risk-based approach to review third party suppliers who may carry a higher risk of modern slavery. HTB Group is committed to acting ethically and with integrity in all business relationships and to enforce effective controls to ensure slavery and human trafficking is not taking place anywhere in HTB Group's operations or supply chains.

- We expect all suppliers to comply with our values. All suppliers are asked to confirm that they have a modern slavery policy that is compliant with regulations, and that they comply with that policy. To demonstrate this commitment all suppliers, confirm their compliance with the requirements of the Modern Slavery Act 2015 before we commence working with them. This is included in our mandatory due diligence checks which are conducted on all new suppliers to the business and in our supplier health check which is undertaken in relation to our strategic and critical suppliers and key outsourcers. We also include obligations to comply with Modern Slavery legislation within our standard form contracts.
- Where non-UK based suppliers are used, we expect these entities to have suitable anti-slavery and human trafficking policies and processes in operation throughout any group structure.
- HTB Group's Third-Party Management Forum (the "TPMF") obtains information from suppliers and records responses. This forum reports into Conduct, Compliance and Operational Risk Committee (the "CORC").

- Furthermore, other policies that are used when HTB Group engages with third parties including Health and Safety and Data Protection policies. Procurement requires suppliers to confirm they have policies that are compliant with each regulation.

Our Customers and Clients

Risk:

As a customer focused business, we are aware that the risk of modern slavery extends beyond the supply chain and can potentially directly impact our customers' lives.

Due Diligence:

- Our policies on Financial Crime and Anti Money Laundering & Countering Terrorist Financing together with our Financial Crime Risk Appetite Statement set out how we work to help prevent financial crime and terrorism being enabled through HTB Group.
- We have robust due diligence processes in place in relation to onboarding customers and throughout the relationship supported by suspicious activity reporting.
- Product risk assessments take place regularly that include an assessment of the risk that they facilitate financial crime, including Modern Slavery.
- Our HTB values of Specialist Customer Focus, Unwavering Integrity, Team HTB and Delivering Excellence are the foundations of our culture and underpin how HTB conducts business. They outline the expectation of our people's behaviour in all interactions.
- As we continue to grow as an organisation, our assurance approach will also evolve to reflect this commitment and measure effectiveness on an ongoing basis.

Our Staff

Risk:

We do not consider that we operate in high-risk sectors or locations because we are a UK based business with minimal locations. Our recruitment processes are managed centrally, and regular contact is made by managers with candidates.

Due Diligence:

HTB Group uses people employed directly by HTB Group, and our people policies ensure fair treatment of all staff and third-party contractors. We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring within our staff by:

- Making sure our hiring managers and those responsible for recruitment know and understand the legal requirements around appropriate right-to-work checks.
- We ensure we speak to recruitment agencies and make sure they undertake appropriate due diligence.
- We ensure that all recruitment agencies we engage with are registered and speak to them to make sure they are undertaking appropriate due diligence.
- Our Employee Code of Conduct makes clear that we expect our own people, whether permanent or temporary, to be treated with respect and dignity at work and we believe employment should always be chosen.
- Our recruitment process is managed centrally to ensure there is no forced, bonded, or involuntary labour.
- HTB Group is committed to paying our employees a fair wage and regularly review our salaries in line with market benchmarking.
- In addition, our entry salary level is aligned to the UK Statutory National Minimum Wage and National Living Wage.
- Employees are not required to lodge money or identity documents (other than those legally required) to be able to work in the UK.
- Employees are free to leave employment after serving reasonable notice (as per their individual contractual terms).
- In the event of a major incident, employee notifications are conducted every three months. This service is outsourced to an external provider (managed by the Facilities Team). Emergency contact details are retained by HR.
- Whilst individuals are working from home, managers regularly conduct online meetings via Microsoft Teams with individuals.
- Our training provides managers and employees understanding of their own prejudices to support a zero-tolerance to all forms of discrimination.
- We ensure that the minimum age for recruitment is 18.

Where we have identified a potential risk, this can be reported through line managers or HR. In addition, our Whistleblowing Policy, allows employees to reach out to various senior managers and our 'Whistleblowing Champion' for them to listen to, and investigate any concerns an individual may have. Everyone can also contact our Whistleblowing Hotline which is an independent third party who will act on the individual's concerns.

Governance

- Responsibility and accountability for the HTB Group's compliance with the Modern Slavery Act 2015 lies with the Group Board of Hampshire Trust Bank PLC.
- Our Procurement team is the key control function in relation to our suppliers.
- Our Operations team is the key control function in relation to our customers.
- Our HR team is the key control for our employees.

Effectiveness and KPIs

We undertake the following activities to understand the effectiveness of our approach:

- We undertake due diligence checks on all new suppliers to the business and conduct supplier health checks in relation to our strategic and critical suppliers and key outsourcers. The due diligence checks are refreshed on an annual basis.
- We monitor the number of reports received from colleagues relating to suspicious activity and review transaction monitoring alerts. No incidents of Modern Slavery concerns were identified during 2025.
- We complete due diligence on all our clients and will exit a business relationship where any involvement in financial crime, Modern Slavery is reported.
- We use third-party ESG data and research to identify any instances of controversies or poor risk controls in the firms we invest in, including modern slavery. Where specific issues are raised with a company, we have exposure to, our Third-Party Risk Management Team, will look to verify the findings of the specialist service provider and conduct a review of the matter.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner, including:

- **Procurement and Supplier Management Policy.** We set out clearly for all managers and employees of HTB Group the expectation that all procurement is done in a way that enables HTB Group to fulfil its regulatory and legal obligations. The policy also sets the standards for procurement and management of suppliers throughout the HTB Group.
- **Whistleblowing Policy.** We encourage all staff to report any concerns related to our activities and those of our suppliers and provide a mechanism in which they can be comfortable and confident to do so. This includes concerns around modern slavery in our business or supply chain.
- **Conduct Risk Policy.** HTB Group is committed to minimising risks to customers and treating all our customers fairly and in a manner that is consistent with the principles and ethos of Treating Customers Fairly (TCF).
- **Fighting Financial Crime Policy.** We provide all employees with information on what financial crime risks HTB Group may be exposed to, and what responsibilities both HTB Group and its employees must manage these risks.
- Our **Staff Handbook** which defines the behaviours, standards and actions required from all employees, communities, and provision of products and services to clients and customers.
- Our **general Employment Policies** and practices, which reflect employment law, encompassing the provisions of the Universal Declaration of Human Rights, are designed to create an inclusive culture.

Slavery and Human Trafficking

As used in this Statement, the above term refers to a variety of offences, including but not limited to:

- Slavery, servitude and forced or compulsory labour;
- Sexual exploitation, including all offences contemplated in Part 1 of the UK Sexual Offences Act 2003;
- Removal and trafficking of organs outside the context of authorised health treatments;
- Securing services or other type of benefits by force, threats, or deception; and
- Securing services or other type of benefits from children and vulnerable persons.

Engagement and Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in HTB Group's businesses and supply chains, HTB Group provides relevant training to all

employees on the areas of its business where the risk of modern slavery and human trafficking may be discovered or reported to increase education and awareness. This training is assigned to all employees of HTB Group on an annual basis, via our Learning Management System. Completion of the training is required as part of mandatory compliance training. HTB Group employees can re-visit training modules at any time by accessing their Learning Management Platform profile.

Approval

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes HTB Group's Modern Slavery and Human Trafficking Statement, as required by the Act, for the financial year ended 31 December 2025.

This Statement covers the following entities:

- Hampshire Trust Bank PLC;
- HTB Leasing & Finance Ltd.

This statement, which will be reviewed annually and updated as required, has been reviewed by key stakeholders and senior management and has been approved by HTB Group Board of Directors.