Modern Slavery Policy

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Contents

1. Introduction 3
2. Policy Purpose 3
3. Policy Scope 3
4. Definitions 3
5. Policy Requirements 4
6. Roles and Responsibilities 4
7. Policy governance 5
   7.1. Breaches and Exceptions to Policy 5
   7.2. Assurance 5
8. Related Policies 6

1. Introduction

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced labour, child labour, human trafficking, use of illegal migrant workers, withholding of wages, confiscating documents and not offering legally compliant written contracts, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Group has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

1.2 The Group is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Group expects the same high standards from all of its contractors, suppliers and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that its suppliers will hold their own suppliers to the same high standards.

1.3 As a participant of the UN Global Compact Network UK, the Group has pledged to adhere to human rights and labour standards principles and communicates progress annually on integration of the ten UN principles into its strategies and operations. The Group assesses and responds to human rights impacts in accordance with the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and the 2025 Home Office Statutory Guidance on Transparency in Supply Chains.

2. Policy Purpose

The purpose of this policy is to:

2.1 set out the Group's responsibilities, and the responsibilities of those working for and on the Group's behalf, in observing and upholding the Group's position on modern slavery and human trafficking; and

2.2 provide information to those working for and on the Group's behalf on how to identify and report concerns regarding modern slavery and human trafficking.

3. Policy Scope

This policy applies to anyone working for the Group or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, contractors, customer representatives, external consultants, third-party representatives and business partners. This policy will be translated into the languages of the countries where the Group does business.

4. Definitions

The following definitions are used in this policy:

Definition	Meaning
The PLC Board	The Board of Directors of International Personal Finance PLC.
Group	International Personal Finance plc and all companies in which it directly or indirectly owns or controls the voting rights attaching to not less than

	50% of the issued share capital or controls the appointment of the majority of the board of management.

5. Policy Requirements

5.1 People

The Group actively works to create a safe, fair and inclusive workplace for its employees and customer representatives. The Group is committed to equality and fairness for all employees and customer representatives with particular reference to wages, working hours, freedom of association, humane treatment, health and safety, anti-corruption and whistleblowing and the right to speak up.

5.2 Supply Chain

The Group's commitment to addressing the issue of modern slavery in its business and supply chains is communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate on an ongoing basis.

The Procurement Function risk assesses all the Group's suppliers on an annual basis by territory, service type and spend and identifies those suppliers with which it has an on-going relationship which are from a region and/or industry or sector with a high prevalence or modern slavery or other labour rights violations or which rely heavily on low skilled and/or migrant workers. Further due diligence is done on those high risk suppliers including a targeted evaluation process to ensure the supplier understands and is not engaging in the various aspects of modern slavery.

The Group may give support and guidance to suppliers to help them address coercive or exploitative work practices in their own businesses and supply chains. The Group will not do business with any supplier which cannot provide adequate assurance on its approach to modern slavery and will not co-operate with any proposed remediation plans.

5.3 Training

Training on this policy, and on the risk the Group faces from modern slavery in its business and supply chains, is part of the Group-wide annual ethics e-learning training for all employees and customer representatives. Targeted training for employees involved in recruitment or procurement and/or with responsibility for supply chain management, including how to respond to modern slavery identified within the Group's supply chains, is provided as required.

5.4 Accountability Standards

If you become aware of or have reason to believe there has been a breach of the standards and required by this policy, or have any doubts or concerns with respect to potential modern slavery, trafficking or worker exploitation in the Group's organisation or supply chain, please report it directly to the Chief Legal Officer or using our whistleblowing services as set out in section 7.1 below. Any individual responsible for a breach of this policy will be held accountable and may be subject to disciplinary or other appropriate action.

6. Roles and Responsibilities

The PLC Board	Overall responsibility for ensuring this policy complies with the Group's legal and ethical obligations.
Chief Legal Officer	Primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring internal control systems and procedures are effective in countering modern slavery.

Chief HR Officer	Responsible for ensuring that the HR Function understands and complies with this policy and that individuals in the HR Function receive adequate and regular training on it and the issue of modern slavery across the Group.
Group Head of Procurement and Supplier Management	Responsible for ensuring that the Procurement Function understands and complies with this policy and that individuals in the Procurement Function receive adequate and regular training on it and the issue of modern slavery in supply chains.
Legal Function	Responsible for preparing and communicating this policy and the Group's annual Modern Slavery Statement, assessing the impact of external developments in this area and working with the HR function to provide appropriate training to colleagues on this topic.
Local Market Boards	Putting in place procedures and controls to comply with this policy, setting up and enforcing compliance arrangements specific to their businesses and dealing with any breaches and reporting them to the Chief Legal Officer.
Everyone	All employees and customer representatives must comply with this policy and are responsible for reporting any concerns or non-compliance with this policy.

7. Policy governance

7.1 Breaches and Exceptions to Policy

Exceptions to Policy	No deviations from this policy are permitted.
Breaches of this Policy	All breaches of this policy must be notified to the Chief Legal Officer.
Whistleblowing	If for any reason you are uncomfortable reporting a breach as requested above you can access the Group's independent whistleblowing services at https://report.whistleb.com/en/ipf for European, IPF Digital or Group related matters or https://hacerlocorrecto.ethicsglobal.com/ for Mexico.

7.2 Assurance

Owner	This Policy is owned by the Chief Legal Officer.
Assurance mechanisms	Annual reporting on modern slavery to the PLC Board. Global Procurement Committee reviews data on supplier categorisation and risk management on a quarterly basis and oversees compliance with the Group Procurement Policy and Procurement Standards. Annual training provided to all employees and customers representatives.

8. Related Policies

Responsible Procurement Policy
Anti-Bribery and Corruption Policy
Whistleblowing Policy