



MODERN SLAVERY STATEMENT

Santander UK

2025

It starts here

Introduction

This is Santander UK’s tenth statement pursuant to the Modern Slavery Act 2015 (the Act) and relates to the year ending 31 December 2025. This Statement sets out the steps we are taking to prevent modern slavery and human trafficking (MSHT) in our workforce and supply chain, as well as detecting and disrupting those profiting from the proceeds of MSHT. Since the introduction of the Act, we continue to review how we prevent MSHT in our business and supply chain. Our key focus areas, each of which are covered in this Statement, are:

- Risk associated with **third party suppliers**;
- **Customer** due diligence, collaboration and information sharing;
- **Employee** training; and
- **Pensions** providers.

We recognise that our response to MSHT should continually improve, and we welcome stakeholder feedback to help strengthen and develop our strategy in this area. The Banco Santander Sustainability policy, updated in February 2025, sets out the commitment of the entire Banco Santander Group to protect human rights. This policy incorporates the UN Guiding Principles on Business and Human Rights and sets out our opposition to forced labour and child exploitation.

This updated policy has also been adopted at a Santander UK level, strengthening our local approach and commitment to tackling human rights violations. Our position is that **Santander UK will not enter into or maintain relationships with persons and/or entities known to be involved in human rights abuses such as child labour and modern slavery.**

As part of Banco Santander we are either a signatory to, or abide by, the principles of various international and national sustainability initiatives and standards. These principles support our approach to such topics as modern slavery. These include but are not limited to:

- Equator Principles (International Finance Corporation guidelines).
- Free, prior and informed consent (FPIC).
- United Nations: Universal Declaration of Human Rights.
- United Nations Global Compact.
- Principles for Responsible Banking (UNEP FI).
- United Nations Sustainable Development Goals.
- Code of Conduct of the European Commission for European enterprises operating in developing countries.
- United Nations Guiding Principles on Business and Human Rights.
- OECD Guidelines for Multinational Enterprises.
- Fundamental conventions of the International Labour Organization (ILO).

The principal areas of modern slavery risk for Santander UK arise in relation to our supply chain and how we engage with third parties, as well as customers, with regards to handling the proceeds of human trafficking.

We recognise that, as MSHT represents one of the largest global criminal industries, financial institutions are in a unique position to disrupt the industry by identifying the proceeds held by perpetrators of these crimes and sharing intelligence with law enforcement agencies. We therefore recognise that we must regularly review our processes, identify areas for improvement and set out targets for adopting enhancements.

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TSB acquisition

This report refers to the activity of Santander UK Group Holdings Plc (including the companies listed to the right) through the year of 2025. As our acquisition of TSB was ongoing in 2025, the modern slavery mitigation activities of TSB are not included in this statement.

You can find the latest TSB Modern Slavery Statement via their website.

This Statement has been approved by the Board of Santander UK Group Holdings plc and Santander UK plc on 23 April 2026.

Companies covered by this statement:

- Santander UK Group Holdings plc
- Santander UK plc
- Santander Consumer (UK) plc
- Cater Allen Limited
- Santander Financial Services plc



Mahesh Aditya

Mahesh Aditya
CEO, 23 April 2026

A word from Andrew Wilson

Our focus remains on prevention, on strengthening our ability to identify and respond to risk, and on maintaining a culture in which concerns are raised and addressed swiftly.

Andrew Wilson

Director of Communications,
Marketing and Responsible Banking



Tackling the scourge of modern slavery and human trafficking will always be a priority for Santander UK. It is a complex and evolving challenge that affects the wider economy, so it requires our full commitment and that of our third parties and suppliers to identify risks and put in place the measures that enable us to act. It is what our customers and shareholders expect of us.

This is our tenth Modern Slavery Statement since the Modern Slavery Act 2015 came into force, which provides an opportunity to reflect on the progress we have made and how we can continue to strengthen our approach.

We must demonstrate robust governance, transparent reporting and a clear focus on outcomes. Therefore this year's Statement is presented in a clearer and more accessible way, with greater emphasis on the areas stakeholders most often ask about: how risk is identified and assessed, how it is addressed, and how effectiveness is monitored.

In 2025, our focus was on strengthening activity across several areas of the business.

We recognise the complexities within the supply chain require careful monitoring that must adapt and develop to the changing nature of each sector's and service's risk. Through our partnership with the charity Unseen, we enhanced our assessment of supplier risk and used that insight to inform priorities and controls. This included reinforcing supplier expectations, improving risk assessment at key points in the supplier lifecycle, and ensuring appropriate escalation routes where concerns are identified.

Alongside this, initiatives within our Economic Crime function were progressed to strengthen our ability to detect, deter and disrupt activity that may be associated with exploitation.

Financial crime risks and typologies continue to evolve, and our work is informed by ongoing learning and, where appropriate, collaboration with industry and law enforcement partners. While no single organisation can address these risks alone, we believe financial institutions can make a significant contribution through vigilance, strong controls and constructive partnerships.

Another advancement has been to expand our approach to measuring effectiveness to support accountability and continuous improvement.

Modern slavery is often hidden and underreported, but rightly, there is an expectation from stakeholders that we provide assessment about the effectiveness of the controls we have in place. This year's Statement therefore sets out a broader range of KPIs and risk indicators, and how these help us monitor performance, identify trends and target further improvement.

I would like to recognise colleagues across Santander UK who contribute to this work, including teams in procurement, economic crime, risk and legal, as well as the partners who support and challenge us. This is a shared effort, and we place real value on collaboration and professional expertise.

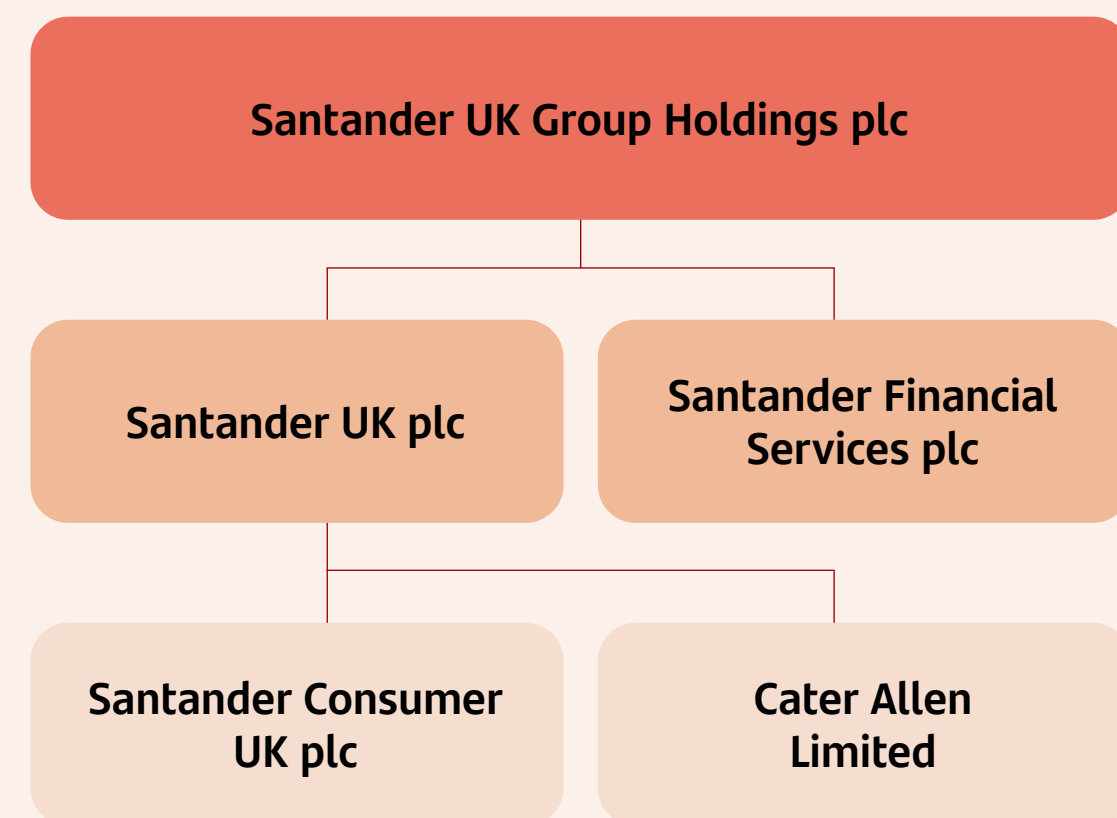
It is testament to the commitment and due diligence of our people and processes that, during 2025, no substantiated cases of modern slavery or human trafficking were identified in our business or supply chain. While this is encouraging, our focus remains on prevention, on strengthening our ability to identify and respond to risk, and on maintaining a culture in which concerns are raised and addressed swiftly.

+ [READ MORE IN OUR FULL REPORTING SUITE ONLINE](#)

OUR APPROACH

Santander UK Group Holdings plc and relevant subsidiaries (together, Santander UK) operate primarily in the UK and provide a wide range of personal and commercial financial products and services. Santander UK has approximately 13.6 million active customers with over 15,000 employees and operates through 363 branches as well as regional Corporate Business centres across the UK.

This statement covers four entities within our Santander UK Group Holdings business.



Our purpose

To help people and businesses prosper

Our aim

To be the best open financial services platform, by acting responsibly and earning the lasting loyalty of our people, customers, shareholders and communities

Our how

Everything we do should be Simple, Personal and Fair

At Santander UK we manage our business through three customer business segments:

Retail & Business Banking (RBB)

providing UK mortgage lending, banking services and unsecured lending to individuals and small businesses.

Corporate & Commercial Banking (CCB)

providing banking and services to SMEs and larger corporates.

Consumer Finance (SCUK)

providing prime auto consumer financing for individuals, businesses, and automotive distribution networks.

Our Modern Slavery & Human Trafficking Governance Structure

Santander UK Board (and Committees)

The Board is collectively responsible for promoting the success of Santander UK for the benefit of its stakeholders, taking into account the likely impact of our decisions in the long term, as well as balancing the interests of our other stakeholders and our contribution to wider society. The Board reviews and signs off this Statement following recommendation from the Board Responsible Banking Committee (RBC).

Santander UK Executive Committees

Responsibility for the management of modern slavery mitigation is delegated to both the Disclosure and Executive Committees. This Statement requires oversight by these governance bodies prior to recommendation to the RBC.

ESG Leadership Forum

This forum oversees the activity within the MSHT Oversight Group (below) and associated workstreams, and approves this annual Statement.

Modern Slavery & Human Trafficking Oversight Group

Our oversight group meets quarterly and provides strategic direction and encourages collaboration on key aspects of MSHT across the organisation, enhancing our ability to deter, detect and disrupt economic crime and the risks associated with MSHT. Includes representatives from various divisions listed below, with support from business segments, CCB, RBB and SCUK.

Sustainability | Economic Crime | Pensions | Procurement
People & Culture

Our business

Our people

Our People & Culture division plays a central role in shaping Santander's workplace environment and supporting our colleagues throughout their employment journey. Their remit includes areas such as recruitment, employee relations, talent, reward, wellbeing, and organisational culture. Through these areas, we ensure that our people practices promote fairness, inclusion, and ethical conduct across all levels of the organisation.

Sustainability

Our Sustainability team manages our sustainability strategy. This strategy encompasses environmental, social and governance (ESG) matters. Our social strategy includes working with vulnerable customers, encouraging and enabling financial inclusion and education and managing regulatory and legislative mandates. This Modern Slavery Statement has been coordinated by our Sustainability team, with the input of various divisions across the bank.

Our economic crime function

Our Financial Intelligence Unit (FIU) sits within the Economic Crime Risk Division with its purpose to source, develop, analyse and disseminate intelligence to key areas of the business. A priority of the FIU is to enhance its capabilities to detect, deter and disrupt all forms of modern slavery, human trafficking, child exploitation and organised immigration crime (OIC) threats.

Effective collaboration and information sharing are recognised as essential to understanding the evolving risk of MSHT. A key focus regards how methods and money flows are changing and adapting to evade detection, and what can be done to ensure these crimes are detected and disrupted.

Collaboration

We are committed to sharing intelligence with law enforcement agencies, and industry intelligence sharing mechanisms such as the Joint Money Laundering Intelligence Task Force (JMLIT), Economic Crime and Corporate Transparency Act (ECCTA) and Public Private Partnership (PPP). We engage through the JMLIT and PPP expert working groups, including cells which focus on specific MSHT or OIC threats.

In 2025 we provided support with the intelligence collection and financial analyses on a variety of OIC investigations. Focus continued on developing typologies that will help us identify human trafficking or related crimes and sharing these typologies with industry and other economic crime professionals.

Engagement with the National Crime Agency's (NCA) Data Fusion project continued, whereby the FIU seconded staff to the NCA as it moved to an operational working model, acting on live events. The initiative enhanced the sharing of financial intelligence to support the disruption of organised crime activity. The project also improved collective understanding of MSHT and OIC threats.

Our impact

As a financial services organisation, our most significant contribution to the prevention of MSHT is through the identification of proceeds of this crime. Human trafficking is a serious predicate offence to money laundering, which generates around US\$150 billion a year globally in profits for traffickers, according to Disrupt Human Trafficking, with some 27 million victims, according to ILO estimates. Similarly, ILO states forced labour also generates annual profits of US\$236 billion. As such, we continue with focused efforts to address money laundering associated with MSHT.

OUR PROGRESS:

Our actions in 2025:

- The launch of a Human Trafficking Campaign.
- In testing the legislation of the Economic Crime and Corporate Transparency Act (2023) we continued to encourage knowledge sharing and improvement.
- The FIU completed three deep-dive assessments of different modern slavery themes in 2025. The themes focused on sexual exploitation, child exploitation and County Lines activity, which is a form of criminal exploitation. This was to understand the typologies in detail, detect red flag indicators and recommend AML controls enhancement to ensure the bank remains current on evolving modern slavery threats.
- Continued to share intelligence and information with law enforcement partners via the JMLIT.
- Developed our approach to deter, detect and disrupt MSHT and OIC by utilising new methods of detection and intelligence development as part of the Data Fusion Pilot.

Our actions for 2026:

- Our Economic Crime teams will continue to lead and deliver our Human Trafficking Campaign, which began in 2025, throughout Q1 2026.
- Deep-dive analysis into key MSHT typologies will conclude.
- Information sharing to Law Enforcement Agencies will continue via the JMLIT and Data Fusion initiatives.
- Opportunities to receive and share information relating to money laundering and MSHT activity within the regulated sector will continue to be explored.

Our supply chain

Santander UK works with a wide range of suppliers across a broad spectrum of services to ensure we are ‘making our customers’ better happen’ every day. There is an expectation that all our suppliers operate in accordance with relevant legislation and regulatory guidelines, with the majority of our suppliers based in the UK. Santander UK builds effective relationships with our suppliers to minimise risk and understand our supply chain.

The Cost & Procurement function at Santander UK is responsible for sourcing, contracting, and managing third-party risk across all business areas. The Third-Party Risk Management (TPRM) team ensures that suppliers operate to the same ethical, social, and environmental standards as Santander, maintaining compliance with regulatory, reputational, and operational expectations. This function works to ensure that all suppliers uphold human rights and ethical labour practices throughout their operations and supply chains. MSHT risk is embedded within our supplier due diligence and lifecycle management processes.

Procurement is the key control point for preventing modern slavery in the supply chain. Whilst financial services are lower risk for direct labour exploitation, risks can exist deeper in supply chains (e.g. IT hardware, facilities, outsourced operations). Our Procurement & TPRM functions are responsible for ensuring suppliers comply with the Modern Slavery Act.

Key areas of focus:

- Conduct enhanced due diligence on suppliers in high-risk sectors and geographies.
- Provide modern slavery awareness training to procurement professionals and contract managers.

- Maintain transparent escalation and remediation processes where risks are identified.
- Collaborate with modern slavery charities to share best practices and intelligence on modern slavery risks.

Governance

Our Third-Party Risk and Supplier Forum reviews third-party supplier risks and provides a mechanism to escalate key issues identified to senior risk fora within our corporate governance framework. These risks would be escalated to our Reputational Risk Forum (RRF). The RRF includes Executive Committee members and holds ultimate responsibility for reviewing modern slavery risks with suppliers, reporting onwards to our Board Responsible Banking Committee. There have been no risk escalations to the RRF in 2025.

Unseen analysis

In 2025 we continued to work with Unseen to identify, assess and categorise modern slavery risks across our third parties. Unseen is a UK charity established in 2007 that works with individuals, businesses, governments, communities and other charities to help eradicate modern slavery. Participation in the Unseen Business Membership Hub enables us to engage with other organisations in the Finance Sector to collectively strengthen our understanding and capability.

To improve our approach, Unseen completed a risk assessment of our complete active supplier list using their methodology, which reviews multiple industry standard data points such as taxonomy and location information, and subject matter expertise to identify and assess the inherent risk. The risk assessment highlighted that, of the suppliers that present a risk, 8.5% require further analysis. However only approximately 1.6% presented a very high risk due to a combination of commodity type, location and context of the service as well as the supply chain model.

In 2026 our collaboration with Unseen will continue, utilising their insight to enhance our approach to modern slavery. Using various data points, high-risk areas of focus will be determined and mitigation strategies implemented. The collaborative model is to be expanded and enhanced, where our in-house assessment team take responsibility for any in-depth assurance activity that is required following the identification of high-risk suppliers by Unseen. This approach will enable us to target and prioritise mitigation.

Supply chain exposure

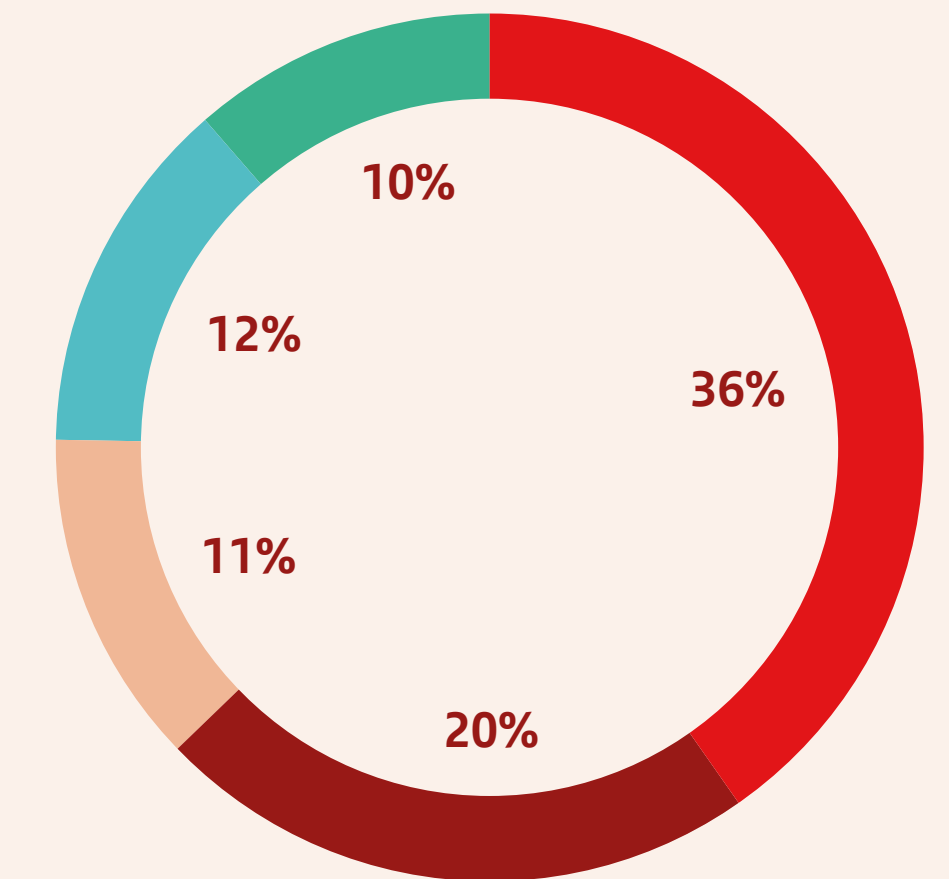
As a UK bank, our exposure to modern slavery risk arises primarily through our supply chain. Spend analysis is therefore used as a key risk indicator to identify areas of heightened modern slavery risk and to prioritise proportionate due diligence. This includes review of commodity and geographical identifiers.

Spend analysis enables the bank to focus enhanced modern slavery due diligence on labour-intensive services where the risk of exploitation is highest and where the bank has meaningful commercial leverage to influence supplier behaviour.

2025 spend data shows Technology accounted for c.36% of our annual spend. Core operational overheads (Facilities and Related Services, Operating Expenses, Corporate Support) represented around 34% of the commodity spend data.

In 2026, further analysis of material and high-risk suppliers operating in countries and sectors associated with elevated modern slavery risk is planned. Outputs will be used to prioritise mitigation activity, encourage corrective action and inform improvements to our MSHT risk position.

Commodities by Spend

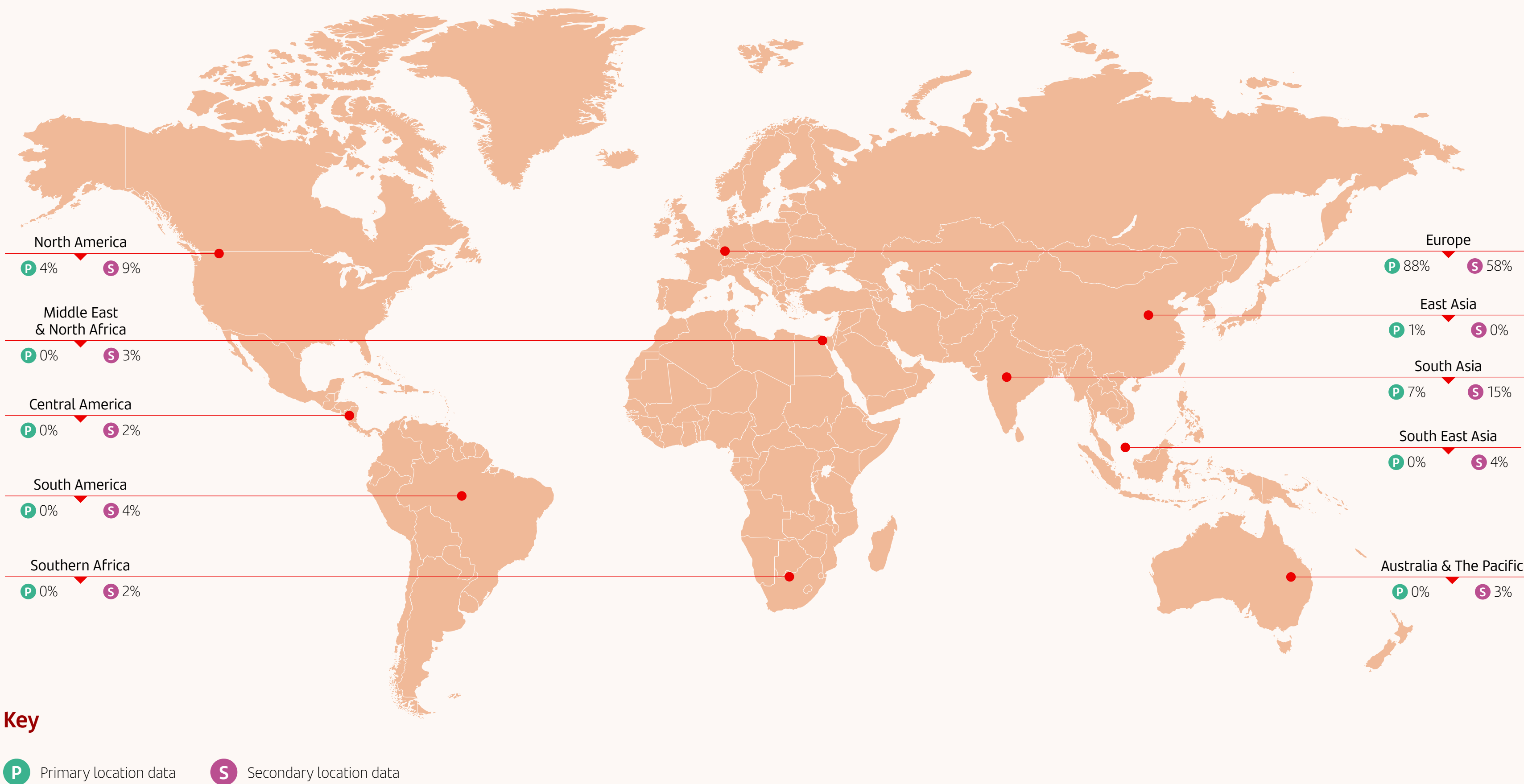


| | 2025 | 2024* |
|-----------------------------------|------|-------|
| ● Technology | 36% | 34% |
| ● Contractors and Consultants | 20% | 18% |
| ● Operating Expenses | 11% | 10% |
| ● Facilities and Related Services | 12% | 14% |
| ● Corporate Support | 10% | 13% |

* The way in which we calculate our commodities by spend has changed. Therefore the information disclosed in our 2024 Modern Slavery Statement differs from that provided above.
* Additionally, the above spend data focuses on five key commodity types, and is not exhaustive.

Our supply chain continued

Geographical operating location of our suppliers within scope of Unseen further analysis



Geographical operating locations are captured via risk analysis using information gathered for each supplier engagement with Santander UK. The available data captures primary locations as well as data on other countries in which the supplier may conduct its activity, per its engagement with Santander UK, known as a secondary location.

The United Kingdom presents a large portion of the contribution to the European percentage. As a UK bank, Santander UK predominantly contracts with large, multinational suppliers that are headquartered or have a substantial presence in the UK and Europe, where the core supply chain is located. Due to stronger labour law frameworks and regulatory enforcement this reduces the inherent risk exposure to modern slavery risk; however, geographic concentration does not eliminate this risk exposure, as it remains present in specific sectors identified as high risk.

UK-based suppliers are subject to domestic labour protections, established regulatory oversight, and direct contractual visibility. Europe-based suppliers are also subject to robust labour laws; however, their use may introduce additional cross-border labour considerations, more complex subcontracting and agency models, and increased fourth-party risk.

Although representing a minority in the data, compared to the overall percentages, non-UK and European regions can have a high risk due to variations in labour practices, enforcement, reliance on migrant labour, extended supply chains and sponsorship employment models.

Geographical analysis is used to inform our modern slavery controls, enabling enhanced due diligence in high-risk regions while applying proportionate control in lower-risk regions. This approach supports risk-based supplier engagement and ongoing oversight.

Our policies

We ensure ethical factors are properly considered when conducting business. We therefore adhere to several policies, codes and internal rules inspired by the best practices, international conventions and protocols, codes of conduct and guides. Our compliance with these policies is a process of continuous improvement.

For example, our Pensions team, who manage our defined benefit pension scheme, have embedded MSHT requirements into our third-party requirements and within the governance of the scheme through policies and public disclosures.

The Code of Conduct sets out expectations regarding ethical behaviour and recognises the impact of financial crime on customers, employees, communities and wider society. It underpins our approach to integrity and accountability.

A range of people policies supports fair and ethical employment practices. These include pay and overtime, screening, and recruitment and selection, all of which work to ensure our people are treated fairly. Our screening policy, for example, works to verify their identity and right to work status, although we acknowledge right to work status is not sufficient in entirely mitigating MSHT risk. Formal policy reviews include specific MSHT considerations, ensuring that employment-related controls, processes, and policies do not enable exploitative practices.

All people policies were reviewed in early 2025 to confirm alignment with ethical and legal standards.

On the following page we set out our key policies relevant to MSHT.

OUR PROGRESS:

Our actions in 2025:

- 100% of our people policy reviews in 2025 ensured employment controls, processes, and policies prevent modern slavery and human trafficking.
- Employment controls, processes, and policies continued to mitigate the risk of modern slavery including continuing to pay our employees a real living wage and regularly reviewing payroll data to check for duplicates of wages.
- 98%* of our employees attested to understanding and complying with our Code of Conduct as part of the 'Doing the Right Thing' mandatory training.

Our actions for 2026:

- Confirmation that 100% of our people policy reviews in 2026 ensure that employment controls, processes, and policies prevent modern slavery and human trafficking.

100%

People policy reviews in 2025 included focus on MSHT.

98%

Employees attested to complying with our Code of Conduct

* The small gap to 100% reflects colleagues who are temporarily out of the business, such as those on parental leave or long-term absence, or new joiners still completing their induction.

Collaborating with Law Enforcement



This year, our Economic Crime team proactively developed intelligence relating to a MSHT case involving Vietnamese nationals being exploited to work in cannabis factories across the East Midlands area.

The team held conversations with a Law Enforcement Agency specifically created to combat modern slavery offending, sharing vital intelligence to their ongoing investigation. The intelligence resulted in several offenders being brought to justice following a complex investigation.

The trial at Nottingham Crown Court concluded in February 2025 resulting in multiple suspects being sentenced for conspiring to produce and supply cannabis. The suspect identified by our team was jailed for three years.

Nottinghamshire Police: "This was an extremely complex investigation involving a vast network of criminality. As with all our investigations, financial data formed a crucial part of this case because it allowed us to conclusively link various individuals together. However, what really set this case apart for me was the very proactive approach Santander took in responding to our subject access request. The support we received from the bank's financial crime team really was exceptional – with staff going the extra mile to obtain additional information that may otherwise have passed us by. It is no exaggeration to say that their diligence and professionalism proved crucial in bringing these offenders to justice."

Our policies continued

| Policy* | Description |
|--|---|
| Anti-Money Laundering Standards | Outlines the variants of modern slavery in detail, providing guidance on red flag indicators and the offences as defined by the Modern Slavery Act 2015. Colleagues are also guided on the escalation routes and obligations to report any suspicions or concerns that a customer is partaking in modern slavery activity, disrupting the financial flow of illicit funds derived from MSHT. The Standards provide contact details for both the Modern Slavery Helpline and Stop the Traffik. |
| Code of Conduct + SEE THE POLICY | Our Code of Conduct ('the Code') applies to all employees and directors of Santander UK plc whether permanent or temporary, and includes contractors and agency employees, regardless of role. The Code sets out the standards of behaviour and conduct expected across the organisation and supports high standards in professional practice for the benefit of customers, communities and colleagues. This Code contributes to our Group culture framework 'The Santander Way'. Acting honestly, transparently and ethically is a shared responsibility and underpins the trust placed in Santander UK by those with whom it engages. |
| Code of Supplier Responsibility + SEE THE POLICY | Sets out Santander UK's minimum standards and expectations for all suppliers regarding ethical conduct, labour rights, health and safety, environmental protection, and diversity. Explicitly prohibits the use of forced, bonded, or child labour and requires suppliers to ensure fair wages, working conditions, and freedom of movement throughout their supply chains. Reviewed annually to ensure alignment with the Modern Slavery Act 2015 and evolving regulation. |
| Environmental & Social Onboarding Criteria Policy | Santander UK's Environmental & Social Onboarding Criteria Policy sets out a formal approach to identifying, assessing, and managing environmental and social risks across its business activities, including project finance and lending. It defines criteria for higher-risk sectors and includes a clear exclusion list outlining activities the bank will not finance. The policy requires adherence to applicable international standards and conventions and explicitly prohibits financing client activities, business relationships or transactions that are, or can be proven to be, linked to serious or gross violations of human rights or international human rights law. The policy also sets expectations relating to human rights, with particular attention to social impacts that may arise from business activities, such as the involuntary displacement of local or indigenous populations, the protection of workers' health, safety and labour rights, and potential effects on local communities and other stakeholders. The policy is reviewed at least every two years to ensure it remains aligned with evolving regulatory expectations and best practice. |
| Responsible Banking and Sustainability Policy (Banco Santander) + SEE THE POLICY | Updated biennially, most recently in February 2025, this policy sets out the commitment of the entire Banco Santander Group to protect human rights. The policy incorporates the UN Guiding Principles on Business and Human Rights and sets out our opposition to forced labour and child exploitation. Santander UK have adopted this policy. This policy is reviewed biennially. |

| Policy* | Description |
|--|--|
| People Policies (various) | Our Pay and Overtime Policy ensures our pay framework complies with UK statutory requirements. The Recruitment and Selection Policy guarantees fair opportunities to all who apply for roles and stipulates that applicants must have the right to work in the UK. In line with our Screening Policy, all employees and contractors are required to complete a vetting process, which includes verifying their identity and confirming their right to work in the UK. |
| Contractor and Supplier Standards | We engage with suppliers to provide additional staff resource based on business demand. In line with our Contractor and Supplier Standards these staff receive no less favourable terms and conditions than our permanent workforce and we work in compliance with the UK's Agency Worker Regulations. |
| ESG Protocol / Contractual Terms & Conditions | Contractual addendum included in supplier agreements outlining Santander UK's ESG requirements, covering human rights, labour practices, environmental impact, and ethical governance. Legally binds suppliers to comply with anti-modern slavery obligations, including transparency in supply chains and cooperation with audits, investigations, and remediation actions. Reviewed annually to reflect updates in UK and EU legislation, global ESG standards, and Banco Santander policy changes. |
| Responsible Procurement Policy | Defines how Santander UK integrates ESG principles into procurement and sourcing activities, including due diligence, risk assessment, and supplier selection. Embeds modern slavery risk considerations into the procurement lifecycle – ensuring that suppliers uphold ethical labour standards and are monitored for compliance. Reviewed biennially, or sooner if regulatory or corporate requirements change. |
| Santander UK Sanctions Policy | In line with the Global Human Rights Sanctions Regulations, which highlight the utilisation of sanctions as a tool to deter and provide accountability for perpetrators of human rights abuses, this policy takes account of all required mandates and recognises sanctions legislation as being absolute. Santander UK has zero tolerance for sanctions breaches. |
| Sensitive Sectors Policy | One of the sensitive sectors is 'Adult Entertainment' which focuses on the sensitivity around the adult entertainment sector which arises from the risks within the sector such as the promotion of gender inequality, ease of access to pornography, human trafficking, forced and child labour, and links to prostitution, drugs, crime and money laundering risk. The policy is reviewed at least every two years. |
| Whistleblowing Policy | Provides clarity on who can raise whistleblowing concerns, which includes but is not limited to, all employees, including those employed through a third party, directors and non-directors, and other stakeholders. This also includes any subsidiaries or joint ventures. It outlines our approach to whistleblowing concerns and the process which would be followed to investigate and respond to concerns raised. The policy is supported by annual mandatory training for all employees, and we do not tolerate the victimisation of whistleblowers. |

* Links are provided for public-facing policies only.

Due diligence

Banco Santander's 2024 Human Rights Due Diligence report outlines how the Group identifies, assesses, and manages potential and actual human rights impacts across its global operations, business activities, and supply chains. It applies to all business areas and is overseen by the Responsible Banking, Sustainability and Culture Committee.

The due diligence exercise aims to:

- identify and evaluate human rights risks across Banco Santander's value chain;
- strengthen preventive, mitigating, and remedial mechanisms;
- improve internal communication and reporting channels; and
- develop a structured system to monitor and manage human rights risks.

Aligned to these aims, Santander UK also puts great importance on due diligence related to human rights, and MSHT in particular, as detailed by our divisions below.

Our people Onboarding

All our employees, including those supplied through a third party and contractors, are required to go through a vetting process, which ensures they have a right to work in the UK. This aids the process of ensuring that our employees and contractors have not been subjected to human trafficking, although we acknowledge this is not sufficient to fully mitigate the risk of MSHT.

Additionally, all our recruitment methods (whether via suppliers or direct recruitment) comply with the 'Employer Pays' principle.

Union support

Santander UK has a successful history of working in partnership with our recognised trade unions, Advance Union (AU) and the Communication Workers Union (CWU), who collectively negotiate on behalf of our UK workforce (approximately 99.5% of employees). Consultation takes place on significant proposals including those relating to change across the business at both national and local levels. All employees are made aware that they can join a union if they wish to.

Pay

We pay employees a real living wage and have been an accredited Living Wage employer since 2015.

Our customers

Our cooperation with internal and external stakeholders, including financial institutions, law enforcement agencies and specialist NGOs, is an important and effective tool in the ongoing fight against MSHT.

As a result of reports made by Santander UK over the past five years, we understand that the activities of criminals seeking to profit from modern slavery and human trafficking have been disrupted by law enforcement. We are proud to have played a role in ensuring that those criminals can be brought to justice. However, whilst this reflects effective collaboration, continued vigilance and cooperation across the financial services sector remains necessary to address evolving MSHT risks.

Pensions

The Santander UK Group Pension Scheme is the bank's legacy defined benefit arrangement, which has over 55,000 members and £7.6 billion in assets. The scheme's assets are managed by external fund managers and the day-to-day running of the scheme relies on a range of third parties which provide professional services.

Many of our fund managers and suppliers are well known, established institutions which have publicly set out the steps they take to mitigate the risks of MSHT within their respective businesses. We also use fund managers and third-party suppliers which may fall outside of the scope of the Act. In such cases we perform a risk assessment and agree further steps which may need to be taken to mitigate the risks, such as termination of a service or disinvestment/redemption of assets from a fund manager where possible. We have concluded that the risk of MSHT here is low.

We rely on disclosures from our third parties which we can review. In general, we use blue chip third parties for professional services, therefore risks are generally considered low.

We are actively working through each of our pensions suppliers and fund managers to understand their MSHT arrangements by reviewing their modern slavery statements.

OUR PROGRESS:

Our actions in 2025:

- Our Pensions team performed their modern slavery analysis as part of our modern slavery due diligence.

Our actions for 2026:

- Our Pensions team will repeat the modern slavery analysis and continue to engage with fund managers/suppliers.

Launching Our Human Trafficking Campaign



This year we launched our 2025/6 Human Trafficking Campaign. The campaign sets out to drive internal and external collaboration, empower customers and bank staff to detect, deter and disrupt modern slavery and human trafficking.

This campaign has a number of phases with a roll out in Q4 2025, through Q1 2026.

The campaign will be a multi team effort within Santander UK plc and include endorsement from external MSHT stakeholders such as:

- Gangmasters Labour Abuse Authority
- Unseen
- Red Compass Labs
- Stronger Together

Due diligence continued

Utilising Artificial Intelligence



We have successfully implemented an artificial intelligence tool designed to combat modern slavery and human trafficking. Use of the technology developed by ThetaRay has enhanced Santander's ability to identify suspicious activities in customer accounts to detect possible exploitation.

To help ensure accuracy, each suspicious activity alert is looked at by a human expert within our financial crime prevention team of more than 1,000, before it is escalated to the NCA. Our use of the tool through 2025 provided multiple leads for the UK's National Crime Agency.

Where statements are not available, we perform a risk assessment using publicly available datasets to form a conclusion, as well as engaging with the supplier or fund manager to understand reasons behind non-disclosure.

Fund managers

We have reviewed our pension arrangements to assess whether the relevant fund managers comply with the Act and have taken appropriate steps to help prevent MSHT. Our review covered all 27 fund managers and found that 16 fund managers had produced modern slavery statements setting out credible steps to help prevent MSHT. The remaining 11 fund managers were either not subject to the Act or had not produced a satisfactory modern slavery statement.

Following this initial review, we have worked with the pension fund trustees to carry out an analysis of the 11 fund managers which did not pass our initial review. The analysis used independent third-party data sources and considered issues such as the jurisdiction of investment and the industry sector invested in.

Where available, there was also an analysis of their ESG policies and a review of the fund manager's ESG credentials, to provide a view of the steps taken by each fund manager to uphold standards and prohibit modern slavery or investing in companies which carry a significant modern slavery risk.

The result of this analysis was that, for ten of the 11 fund managers, the modern slavery risk was identified as being 'low' due to a combination of (i) investing in countries with a low incidence of modern slavery, such as the USA and EU countries; and (ii) investing in low-risk sectors such as technology, healthcare, or financial services. In respect of the remaining fund manager, the analysis of their ESG policies highlighted that the fund manager has extensive and robust policies in place

meaning that they would not invest in companies with a high risk of modern slavery issues. The fund manager commonly invests alongside governmental or transnational organisations, or alongside NGOs, and this requires extensive recognition of social issues such as modern slavery risk within the fund manager investment policies. Of the 11 fund managers we analysed, ten fund managers are in 'run-off' as there are no plans to renew their contracts beyond current arrangements.

Third-party suppliers

Our process also includes third-party suppliers, whom we engage to provide services to our pension scheme.

We reviewed 32 suppliers, of which 28 had provided statements pursuant to the Act. The remaining four suppliers were not required to produce statements as they did not meet the necessary criteria. Nevertheless, we reviewed the industry and jurisdictions of these suppliers to determine whether they were at medium or high risk of slavery. Given they were all providing professional services, we concluded the risk was low.

LifeSight

LifeSight is the bank's current pension offering for employees, which is a master trust arrangement. One of LifeSight's key priorities is human and labour rights, which includes considering risks relating to modern slavery. Such considerations are incorporated as part of the whole investment process. Central to this approach are monitoring, assessment, stewardship and escalation of modern slavery risks.

Due diligence continued



Retail & Business Banking – Homes

Santander Homes partners with third-party providers to offer products that recognise and reward customers living in the most energy-efficient homes. We therefore enable the purchase of products such as solar panels.

We currently maintain a number of active partnerships and all suppliers have been carefully vetted, with no adverse practices identified during the selection process.

Each partner has undergone a formal onboarding procedure in line with business requirements. This includes the completion of Vendor Risk Questionnaires, certification and traceability audits where applicable. Supplier agreements incorporate robust contractual

safeguards, explicitly prohibiting forced labour and granting Santander the right to terminate the relationship in cases of non-compliance.

Ongoing oversight includes regular engagement meetings with partners and monitoring external developments, including media reports.

Santander Consumer UK

SCUK provides a range of products designed for the purchase of personal and business vehicles. Our finance and related products are distributed via a network of dealers and intermediary introducers, and also through partnerships with selected car and motorcycle manufacturers, in addition to joint venture partnerships.

SCUK conducts its business to the highest ethical standards, has a zero-tolerance approach to MSHT and stands firmly against all forms of forced labour, exploitation, and slavery.

We are committed to ensuring our operations, partners, and customer relationships are free from such practices. To further support this approach, SCUK is actively engaged in the MSHT campaign, and during 2026, will be working with our colleagues and motor dealer and broker partners (intermediaries), to raise awareness and education, specifically focusing on red flags and reporting requirements.

SCUK maintains robust governance arrangements to ensure that higher-risk relationships are subject to enhanced due diligence and formal review prior to onboarding, continuation, or exit. This governance ensures that SCUK operates within its defined risk appetite and policy framework and prevents the onboarding or maintenance of relationships that fall outside approved parameters – including where indicators of MSHT are identified.

Corporate & Commercial Banking

Our Sustainable Solutions & Finance team, operating within CCB, is responsible for embedding Sustainability into the business functions, and acts as a subject matter expert on all matters pertaining to sustainability within the CCB space. They support the business to embed relevant policies, which includes adhering to all policy related to MSHT.

Given the complexities around the sourcing of solar panels specifically, our internal ESG Panel Governance Meeting has developed a process for reviewing Project Finance transactions which include the funding of solar panel transactions.

As per our Sensitive Sector policy we ensure that appropriate controls are in place to:

- identify all potential and existing clients within the relevant business area that operate in any of the Sensitive Sectors;
- complete all stages of the Sensitive Sector Standards including an analysis and assessment of clients and transactions within scope of this policy; at onboarding, periodic review and new credit-related transactions for any client; and
- monitor the reputational risk profile of clients within scope of this policy as part of ongoing relationship management.

OUR PROGRESS:

Our actions in 2025:

- Solar Panels: Our CCB team have begun work to assess clients' processes for sourcing solar panels.

Our actions for 2026:

- SCUK will be raising awareness and education specifically focusing on red flags and reporting requirements.
- CCB commit to wider training around solar panel complexities relating to MSHT.

Identifying, assessing and managing risk

Our customers

Guidance is readily available and accessible for front-line colleagues relating to MSHT red flags and appropriate actions are to be taken where these are detected.

This allows for appropriate prioritisation within our specialist team. Any disclosure to the NCA will highlight where it is suspected that the customer is either considered vulnerable or a victim, to aid onward external support.

All investigations of money laundering and terrorist financing conducted within our specialist team consider appropriate risk mitigation actions. Actions could include referrals to appropriate teams within the bank to act for both perpetrators and victims of MSHT.

Pensions

We use data from the Walk Free Foundation and the US government to perform a risk score for each non-disclosing supplier or fund manager based on their sector and geography.

Our supply chain

In 2025, significant progress was made in strengthening the organisation's approach to identifying, assessing, and mitigating modern slavery risks across the supply chain.

Regarding supplier onboarding and ESG ratings; 56% of high-risk suppliers were successfully onboarded to the EcoVadis ESG assessment platform, exceeding our annual target of 50%.

Of those onboarded to EcoVadis, 5% of suppliers were identified with labour and human rights scores below 'Good,' a slight improvement when compared to 2024 (8%).

To improve coverage across Santander's supply chain in 2026, a target has been set to onboard 65% of high-risk suppliers to EcoVadis. As we continue to onboard suppliers to the platform, existing suppliers will be monitored, in some cases through the management of corrective action plans. Furthermore, the EcoVadis data will continue to act as a tool to be used as part of supplier assessments and service reviews.

Contractual controls were enhanced during 2025 with the implementation of a new ESG Protocol. The Protocol complements the existing Code of Supplier Responsibility and reinforces due diligence expectations for all high-risk suppliers. Non-compliance with the Code of Supplier Responsibility is tracked and a process is in place to ensure the supplier has equivalent MSHT prevention processes in place.

Compliance with the Code of Supplier Responsibility is a core consideration within supplier certification and onboarding and is a component of the company certification process. Failure to agree and comply with our Code will see the supplier fail the certification process and discontinuation of any prospective supplier relationship.

We complete due diligence during both the onboarding process, and the ongoing service term. Standard contractual terms include labour and human rights, to ensure suppliers comply with our standards and policies.

In 2025 more than 95% of suppliers agreed to comply with our Code of Supplier Responsibility, and the remaining 5% of suppliers who didn't agree were able to evidence equivalent standards that identified no modern slavery gaps. Independent reviews of supplier documentation ensured that these equivalent standards were in place, and no gaps were identified.

To support our due diligence, we ask suppliers to complete a Financial Services Qualification System (FSQS) assessment prior to the start of a contractual relationship with Santander. Part of the FSQS process is a self-assessment questionnaire which requires the supplier to submit assurance and compliance data if they are required to publish a modern slavery statement. This is reviewed and validated by FSQS to ensure it meets the correct criteria used for internal review. Any supplier failing to provide satisfactory answers is subject to a formal review by Santander UK to determine whether they should be onboarded as a supplier or have the partnership renewed.

Building on our approach

To further our governance and performance monitoring approach, we established three Key Risk Indicators (KRIs) for modern slavery, which have been embedded within our ESG dashboard.

- **% of material and high-risk suppliers operating in countries/sectors with elevated modern slavery risks**
- **% of inherent high-risk suppliers without modern day slavery policy or code of conduct**
- **% of suppliers that have completed modern slavery due diligence questionnaires**

We are now developing repeatable data collection and reporting processes to enable integration into a third-party risk dashboard for ongoing oversight.

Our Pensions Processes



In 2025 we engaged extensively with a property fund manager to understand the supply chain within a group of properties. They were able to confirm that each supplier could provide assurance that they were not using any forced labour and had sufficient employment checks in place.

Identifying, assessing and managing risk continued

As part of our targeted supplier engagement and risk analysis approach we have:

- conducted deep-dive assessments of suppliers identified as high risk for modern slavery based on taxonomy and country of operation;
- designed specific questionnaires supporting supplier compliance with modern slavery requirements, as part of our partnership with Unseen; and
- initiated follow-up data analysis and validation processes to strengthen insights into supplier risk profiles.

Risk assessments of our supply chain were undertaken in collaboration with Unseen and identified actions for continuous improvement and explored the use of a new third-party ESG module to enhance monitoring, reporting, and visibility of modern slavery risks across the extended supply base.

Engagement with our MSHT charity partner Unseen, included delivery of a 'Lunch & Learn' on the topic of modern slavery available to all colleagues in our Chief Financial Office. The purpose of the event was to educate the department on the work undertaken by Unseen and

to educate colleagues on what modern slavery is and where risks may be present in the supply chain. A further session is intended for 2026.

Reflecting our commitment to continuous improvement, meaningful progress has been made in strengthening our approach to ESG and modern slavery risk management, while setting clear ambitions for the future.

During 2026, strategic capabilities for ESG monitoring, including MSHT, will be reviewed and enhanced to align more closely with leading industry practices and improve operational efficiency. A key focus will be system integration, with plans to explore the transition from standalone ESG assessments to a fully integrated approach within existing risk management systems. This includes embedding ESG criteria within our established risk framework to enable ESG risk assessments to form part of the supplier certification process.

Supplier segmentation based on ESG and modern slavery risk exposure will continue to support a targeted and proportionate due diligence approach. Building on this, further targeted deep dives into suppliers' capabilities to prevent and address modern slavery risks are planned, with an emphasis on continuous improvement rather than one-off assessments.

Strengthening internal capability remains a priority, and we will continue to encourage ongoing learning to enhance understanding of modern slavery indicators across the organisation. This builds on progress made during the year, including the delivery of a Value Protection Session on modern slavery, which engaged suppliers in sharing best practices and demonstrating effective approaches to mitigating modern slavery risks.

OUR PROGRESS:

Our actions in 2025:

- 56% of high-risk suppliers onboarded to EcoVadis.
- Implemented a new ESG Protocol.
- Conducted deep-dive assessments of suppliers identified as high risk for modern slavery.
- Embedded three KRIs for modern slavery.
- Undertook a risk assessment of the supply chain in collaboration with Unseen.
- Delivered a Value Protection Session on modern slavery.

Our actions for 2026:

- Onboard 65% of our ESG high-risk supplier list to EcoVadis.
- Review and strengthen strategic capabilities for continuous ESG monitoring.
- Conduct targeted deep dives into suppliers' capabilities to prevent and address MSHT risks.
- Implement a 'test and learn' cycle to operationalise ESG insights and modern slavery findings, ensuring issues identified are tracked to resolution.
- Continue segmenting suppliers to prioritise due diligence efforts.
- Encourage ongoing learning and integration into procurement processes.



Speaking up

Santander UK actively encourages and welcomes whistleblowing reports, enabling issues to be addressed at an early stage. Whistleblowing plays a vital role in maintaining fairness, honesty and integrity at Santander. At its core, it is about doing the right thing and protecting our colleagues, customers and the bank.

Santander UK will take all whistleblowing concerns received seriously and will, where appropriate and proportionate, investigate further. A whistleblower's confidentiality will be respected, and a whistleblower will not be treated any differently for raising a concern.

Our whistleblowing arrangements cover permanent, temporary and former employees, including those in any subsidiary or joint venture, as well as suppliers, third parties or similar working for or on behalf of Santander UK, directors and non-executive directors.

OUR PROGRESS:

Our actions in 2025:

- Surveyed our people, resulting in high scores related to our 'speak up' culture.

Our actions for 2026:

- Our internal grievance and disciplinary system will be updated to include a tracking option for any cases relating to MSHT.

Whistleblowing law (PIDA) protects employees and those within the extended definition of a 'worker' (Employment Rights Act 1996 Section 43K), including agency workers, contractors, homeworkers and trainees. We have extended this definition more broadly to include accepting whistleblowing concerns from non-executive directors, candidates in the recruitment process, customers and members of the public in certain limited circumstances.

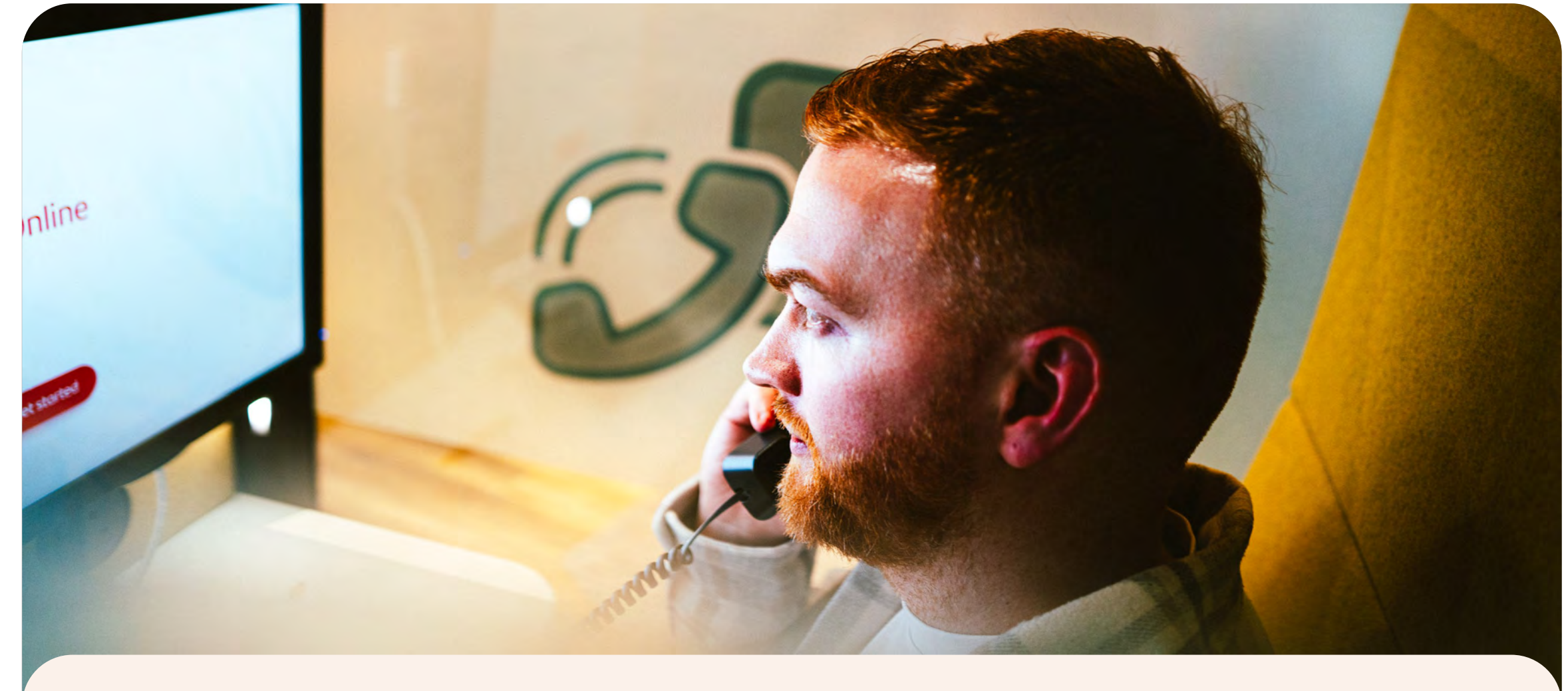
Concerns can be raised on a named or anonymous basis. The Whistleblowing Policy outlines how to raise a whistleblowing concern, support available and the process which would be followed to investigate and respond to concerns raised. Where action is required due to individual misconduct, this would be supported by Santander's disciplinary policy.

Our Whistleblowing Policy is supported by annual mandatory training for all employees. Information on whistleblowing is also included in our Code of Conduct.

At Santander UK, a 'speak up' culture is encouraged. Within the Santander UK engagement tool, at 31 December 2025, our people scored us 9.0/10 on average in response to the question, "I am aware of how to raise a concern via the whistleblowing channels". We scored 8.7/10 on average in response to the question, "I would feel confident to raise a concern via the whistleblowing channels as I believe it would be addressed appropriately."

Santander UK also operates confidential and accessible grievance mechanisms for all workers. Employees can submit concerns which will be addressed appropriately, including via informal resolution, mediation or a formal grievance process, with the internal grievance procedure followed and remediation applied where individual misconduct is identified.

An action has been identified to update our internal grievance and disciplinary system to include a tracking option for any cases relating to MSHT. This will be delivered in 2026.



Raising concerns

Concerns about malpractice can be raised through internal and external reporting channels, including any issues relating to MSHT.

We have engaged with Navex Global, a third-party organisation who operate a telephone and secure web-based service reporting tool called EthicsPoint.

Call: 0800 0698792

Online: www.santanderuk.ethicspoint.com

Concerns can also be reported about wrongdoing or misconduct involving Santander UK employees or contractors by contacting the Santander UK Whistleblowing Team:

whistleblowingteam@santander.co.uk

Concerns can be raised directly with our regulators, the Financial Conduct Authority or the Prudential Regulation Authority.

At Santander Consumer UK, if a colleague knows or suspects that MSHT is occurring, they can report their suspicions to:

compliancefinancialcrime@santanderconsumer.co.uk

Training

At the heart of our Anti-Economic Crime Strategy is that all employees have responsibility for tackling economic crime, which includes protecting our customers from fraud. For this reason, our employees across the organisation are provided with regular and up-to-date training, to ensure they have the capabilities to deter, detect and disrupt economic crime. Furthermore, our Board, Executive Committee and Senior Leaders are strong advocates of building our Anti-Economic Crime Culture: *inspiring and empowering employees to prevent economic crime.*

An in-depth Financial Crime suite of modules and New-to-Role Training Academies are in place. For some roles, completion of an academy and a curriculum of Financial Crime Training (FCT) modules is compulsory. All Financial Crime Training modules are available to all staff to self-serve as part of their personal development. To ensure that Financial Crime Training modules are adhering to current best practices, we work in conjunction with the International Compliance Association (ICA).

The FCT Team provides role-specific modules (many of which are accredited by the ICA) alongside face-to-face workshops and knowledge share sessions, reflecting our commitment to education and awareness.

Additional modules are available on our internal systems that colleagues can access to enhance further learning.

Our 'Doing the Right Thing' mandatory training includes whistleblowing, sexual harassment, and FCA conduct rules, and is required to be completed by all employees, including those supplied through a third party.

All mandatory training is reviewed yearly and all employees, including those supplied by a third party, are required to re-complete any mandatory training relevant to their role on an annual basis.

Our Anti-Money Laundering (AML) module, refreshed annually, provides guidance and support for all our employees in understanding the importance of anti-money laundering and how to spot the signs of abuse by knowing the risk indicators associated with it. MSHT is referenced within this training. The training also details where to go to for further guidance and what to do when suspicions arise on such offences.

This module was completed by 3,598 relevant colleagues this year, from teams including Financial Crime, Audit, Risk and Compliance and more. It forms part of our annual training plans but is also accessible to all colleagues outside of structured training plans.

Additionally, wider Modern Slavery training is available on our internal training platform, Dojo, including episodes on 'Modern Slavery 2025' and 'Modern Slavery and Human Trafficking'. These include sections on what modern slavery is, types of modern slavery and tackling slavery.

A dedicated MSHT module is planned which will be recommended to teams with MSHT exposure. This new MSHT module will be reviewed and refreshed annually following its launch in 2026.

MSHT issues raised via internal processes, central issues register, horizon scanning or other sources are reviewed as part of monthly risk documentation review. Any training gaps are identified and changes implemented to the modules (including where needed to the new starter academies). These changes are either undertaken immediately or as part of an annual refresh process, dependent upon the risk presented.

OUR PROGRESS:

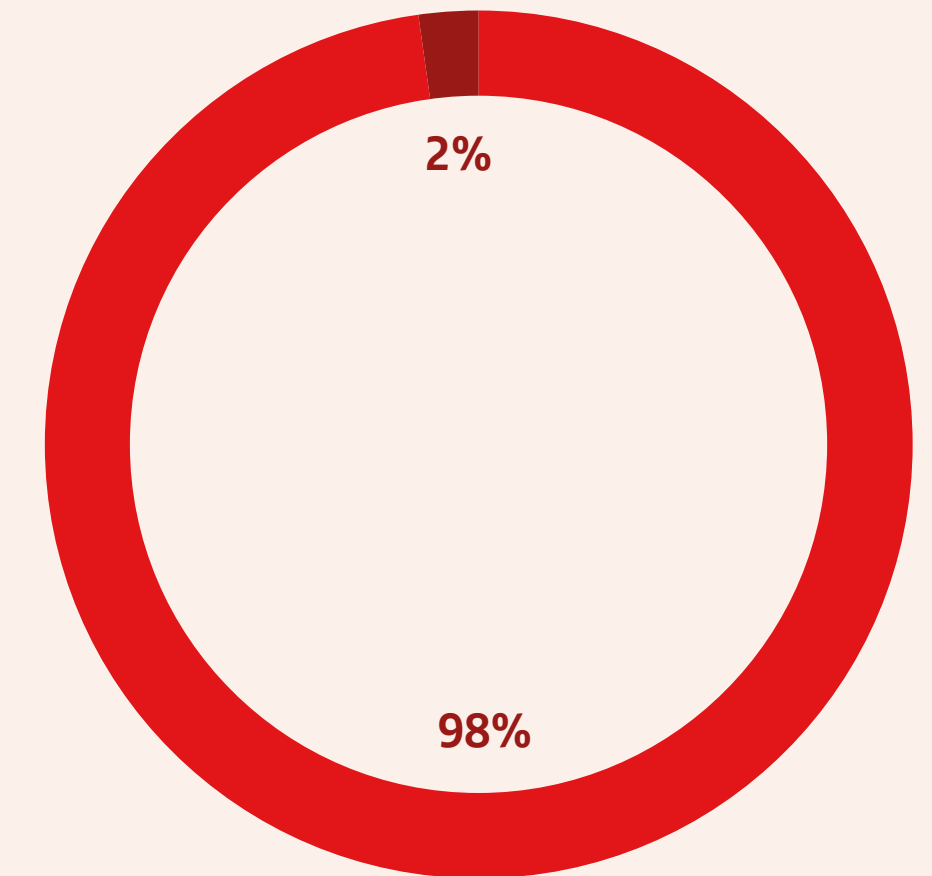
Our actions in 2025:

- 98% of our employees completed the Economic Crime mandatory training module, including content on MSHT for all customer-facing employees.
- 98% of our employees completed Do the Right Thing mandatory training module.

Our actions for 2026:

- >95% of our employees to complete the Economic Crime mandatory training module.
- >95% of our employees to complete the Doing the Right Thing mandatory training module.
- Launch of a full Financial Crime Training module which focuses solely on MSHT.

Mandatory training completed

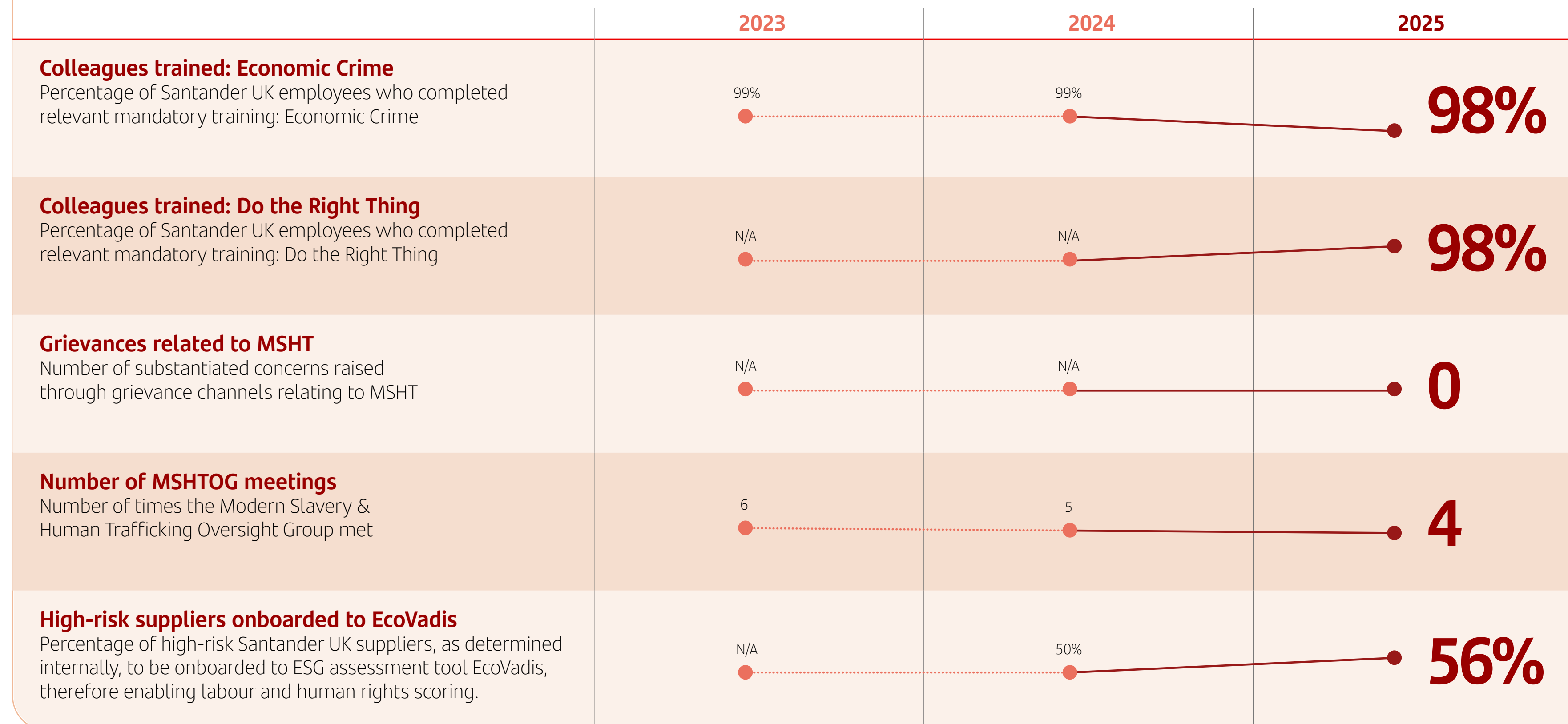


| | 2025 | 2024 | 2023 |
|----------------------|------|------|------|
| ● Completed | 98% | 99% | 99% |
| ● Incomplete* | 2% | 1% | 1% |

* The small gap to 100% reflects colleagues who are temporarily out of the business, such as those on parental leave or long-term absence, or new joiners still completing their induction. All employees expected to complete the training within the stipulated timeframes have done so, and we continue to maintain strong completion rates across the business.

Key Performance Indicators (KPIs)

The detail provided in this Statement evidences our commitment to mitigating modern slavery and human trafficking in our business and supply chain. In addition, in order to measure the effectiveness of our activities, the following selection of metrics are monitored, with the aim to improve our approach to monitoring each year.



Key

..... Data prior to start of KPI tracking — Progress between years

Effectiveness Statement

In line with the detail provided in this Statement pertaining to governance, risk management, training and data, no significant modern slavery risk has been identified in our business or supply chain at present.

The policies, processes and governance arrangements in place are designed to mitigate modern slavery risk across the business and supply chain. With the disclosed controls in place, no material concerns relating to MSHT have been identified.

Our cooperation with internal and external stakeholders, including financial institutions, law enforcement agencies and specialist NGOs, is an important and effective tool in the ongoing fight against MSHT. As a result of reports made and intelligence shared by Santander UK, it is understood that the activities of organised crime groups involved in MSHT have been detected and disrupted by law enforcement agencies.

We are proud to have played a role in ensuring that law enforcement investigations have been enhanced by the contributions of Santander UK, protecting and supporting customers and vulnerable members of the community, whilst working to bring offenders and facilitators to justice.



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