

Zopa Modern Slavery Statement 2025

This statement sets out the steps we took in 2025 to prevent slavery and human trafficking within our organisation and supply chains.

1. Our commitment

Slavery and human trafficking are serious crimes that violate the fundamental rights and restrict the freedoms of its victims.

We're committed to acting ethically and with integrity in everything we do. That means having effective systems and controls in place to minimise the risk of modern slavery and human trafficking across our organisation and supply chains.

This commitment remains as important as ever, especially given the record number of potential victims of modern slavery which were referred to the Home Office in 2025.

We're proud that our people and processes have continued to support this work, and we stand firmly against slavery and human trafficking in all its forms.

2. Our Organisation and structure

We operate in the UK financial services industry, and our group is made up of the following companies:

- **Zopa Bank Limited** (Company number 10627575) through which we provide our customers with a range of banking products, including current accounts, unsecured personal loans, hire purchase loans, credit cards and savings products. Zopa Bank Limited also provides our customers with point of sale finance for retail purchases, through its business arm that trades as DivideBuy.
- **Zopa Group PLC** (Company number 10624955) which is our ultimate parent company.
- **RVVUP Ltd** (Company number 12926115) which operates a payments platform that provides multiple checkout solutions for merchants.

Our banking activities are regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

We employ approximately 1,006 people who mainly work through our London office, but we also have employees who work from Manchester and Spain.

3. Due diligence and supply chain management

We engage external suppliers for a broad range of products and services, which include:

- Technology Services: for the provision of computer and telephone hardware, software, networking, storage and information security services.
- Payment Services: including agency banking, payment network and financial messaging infrastructure, payment processing services and the supply of cards.
- Professional Services: such as auditing and specialist advisory services to support legal, risk management, finance and marketing functions.
- Human Resources Services: including the use of recruitment agencies to find contractors and permanent employees, human resource management systems and payroll software.
- Outsourced Operations Services: for the provision of specialist customer and collections operations services, to support our internal functions.
- Facilities Services: including cleaning, catering, maintenance, utilities, postal services and stationery supplies.

We conduct a risk assessment of all potential new suppliers (except those considered low value or low risk). This includes assessing the likelihood that slavery or human trafficking could take place within their organisation, and the measures they have in place to manage those risks.

Where we determine a new supplier is at high risk of slavery or human trafficking taking place within their organisation (or indirectly through their supply chain), we carry out enhanced due diligence followed by periodic checks of their controls to prevent slavery and human trafficking.

We consider the following types of suppliers present a greater risk of slavery or trafficking impacting our supply chain:

- providers of facilities, construction and building maintenance or manufacturing (including the supply of computer hardware) services; and/or
- suppliers in what we consider to be high-risk geographical locations.

4. Policies and governance

We maintain a set of policies designed to prevent modern slavery and human trafficking within our organisation and supply chains. These include:

- Outsourcing, Procurement and Supplier Management Policy: which sets out our processes for conducting due diligence, and where applicable enhanced due diligence on new suppliers (as detailed above).
- Whistleblowing Policy: through which our staff can discreetly and confidentially raise concerns, including those related to potential slavery or human trafficking. These concerns will then be investigated either by our Head of Compliance or our Whistleblowing Champion.

Compliance with our supply chain management and policy framework sits with our Risk and Compliance Teams, with escalation routes to senior management where appropriate.

5. Preventative steps we took in 2025

We've set out below the steps we took to prevent modern slavery and human trafficking within our organisation and supply chains in 2025.

Steps we took within our organisation

Culture and recruitment: Our culture plays an important role in our fight against slavery and human trafficking. Accordingly, we continued to:

- recruit new staff who are aligned with our values;
- assess the alignment of our workforce against our values; and
- maintain fair and transparent employment practices.

Training and guidance: We provided our supplier relationship managers with training on how to manage and monitor our suppliers. This training focused on the importance of conducting effective initial and ongoing due diligence and considering whether a supplier's industry and/or geography increases the risk the supplier represents.

We also provided guidance to all staff on our whistleblowing policy and procedures, encouraging employees to safely and anonymously report concerns, including those related to slavery and/or human trafficking.

Steps we took relating to our supply chains

Supplier risk assessments and due diligence: In accordance with our Outsourcing, Procurement and Supplier Management Policy, we carried out risks assessments on our potential and existing new suppliers, except for those with a small financial commitment and which are inherently low risk, to assess:

- the risk that slavery or human trafficking could take place within their organisation and supply chain; and
- the effectiveness of the systems and controls they have in place to prevent slavery or human trafficking from materialising within their organisation or supply chain.

Enhanced due diligence: We identified 4 suppliers that required enhanced due diligence. These suppliers included providers of overseas outsourced operational support, maintenance and facilities, and building management services.

Having conducted this enhanced due diligence, no concerns were identified in respect of any of the suppliers.

6. How did we do?

We had no incidents of slavery or human trafficking within our organisation and are not aware of any incidents occurring within our supply chain.

Based on the nature of our business, the United Kingdom's human rights legislation and the strong regulation of the financial services industry, we believe that the likelihood of slavery or human trafficking impacting or arising through our business activities is low.

That said, we're committed to continuously improving our approach and strengthening our processes wherever we can.

7. Approval

This statement in relation to the Zopa Group's 2025 financial year was approved by the Board of Zopa Group PLC on 29 April 2026.

Signed by



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Jaidev Janardana
CEO Zopa Group PLC