Modern Slavery & Human Trafficking Statement

VERSION: 2026

INTRODUCTION

In accordance with section 54 of the Modern Slavery Act 2015 (the Act), Stonebridge Mortgage Solutions Limited and the relevant subsidiary companies identified in this statement (together, the Group) publish this annual Modern Slavery and Human Trafficking Statement. It describes the steps taken by the Group during the financial year ended 31 March 2026 to help prevent modern slavery and human trafficking within its business operations and supply chains.

The Group is committed to conducting business with integrity, transparency and respect for human rights. The Group adopts a zero-tolerance approach to modern slavery, servitude, forced or compulsory labour and human trafficking throughout its business operations and supply chains. We expect employees, workers, contractors, appointed representatives, suppliers and business partners to uphold the same standards.

Although the Group operates in the UK financial services sector and considers its direct workforce and overall business model to present a relatively low inherent risk, we remain alert to risks that may arise through third-party suppliers, outsourced services, recruitment arrangements, labour-intensive services, manufactured goods and subcontracting.

During the reporting period, the Group continued to maintain policies, training, whistleblowing arrangements, recruitment checks, supplier due diligence and contractual controls designed to identify, prevent and address modern slavery risk. The Group will continue to review the proportionality and effectiveness of these arrangements and strengthen them where risks or opportunities for improvement are identified.

ORGANISATION STRUCTURE

Through its network distribution model and subsidiary businesses, the Group provides financial services and related services to consumers and businesses in the United Kingdom.

- Services provided to consumers include the distribution of mortgages, protection products and general insurance.
- Services provided to businesses include software distribution, commercial distribution arrangements and regulated network services for appointed representatives.

This Group statement covers the following businesses:

- Stonebridge Mortgage Solutions Limited
- Revolution Company (Essex) Limited
- MoneyQuest Mortgage Brokers Limited
- Stonebridge Genus Limited
- Mortgage Support Services Limited

As of 31 March 2026, the Group employed approximately 200 people across the UK, where its business operations are based.

GOVERNANCE AND RESPONSIBILITY

The Board has overall responsibility for ensuring that this statement complies with the Group's legal and ethical obligations and for overseeing the effectiveness of the arrangements designed to prevent modern slavery and human trafficking. The Senior Leadership Team supports the implementation of those arrangements across the Group.

Day-to-day responsibility for coordinating the Group's approach, reviewing this statement and monitoring its use and effectiveness rests with the Head of Risk Assurance & Compliance, supported by relevant business owners. Managers are responsible for ensuring that colleagues understand and comply with the controls applicable to their roles.

Employees, workers, contractors, appointed representatives and suppliers are expected to support the Group's commitment to ethical business conduct and to raise concerns promptly through the available reporting channels.

OUR SUPPLY CHAIN

The Group has direct relationships with primarily UK-based suppliers delivering professional services, utilities, telecommunications, technology, recruitment, facilities management, cleaning, maintenance, security, catering, office equipment, marketing materials and other goods and services supporting our premises and regulated activities. As part of its service delivery, the Group also procures services for the benefit of customers of certain Group subsidiary companies.

The Group expects suppliers and contractors to comply with applicable modern slavery legislation and, where required by law, to publish and maintain an appropriate modern slavery statement. Where possible, new supplier agreements include obligations to comply with the Act, implement proportionate due diligence within the supplier's own supply chain and notify the Group of any actual or potential modern slavery incident.

Where a supplier breaches these requirements, the Group will seek appropriate remediation and may suspend or terminate the relationship where the issue is not resolved satisfactorily. Relevant contractual provisions are reviewed periodically and amended where appropriate.

OUR POLICIES

The Group's approach to promoting human rights and ethical conduct is supported by policies and control frameworks that apply to individuals employed or engaged by the Group. Relevant arrangements include:

- Whistleblowing Policy, which provides confidential routes for employees to report suspected concerns within the Group or its supply chains.
- Recruitment and selection procedures, including right-to-work and appropriate pre-employment checks and the use of reputable recruitment agencies.
- Equality, diversity and inclusion arrangements, which support fair treatment and a working environment free from unlawful discrimination.
- FCA conduct rules and associated standards of ethical business behavior.
- Financial crime and anti-money laundering arrangements, which recognise the potential links between exploitation, modern slavery and money laundering.
- Supplier onboarding, due diligence and contracting arrangements.

DUE DILIGENCE

The Group applies a proportionate, risk-based approach when appointing and reviewing suppliers and contractors. The level of due diligence reflects the nature of the goods or services, the delivery location, the use of labour or subcontracting, the supplier's operating environment and any other indicators of heightened modern slavery risk.

Depending on the assessed risk, due diligence may include:

- Obtaining assurance that the supplier or contractor complies with applicable modern slavery legislation and reviewing its published modern slavery statement where legally required.
- Considering the supplier's location, operating model, workforce arrangements, use of recruitment agencies and reliance on subcontractors.
- Seeking assurance that child labour, forced labour, servitude, trafficking, harsh or inhumane treatment and worker exploitation are not present within the supplier's business or supply chain.
- Confirming that appropriate right-to-work and pre-employment checks are undertaken and that workers are paid at least the applicable National Minimum Wage or National Living Wage.
- Confirming that working hours and employment practices comply with applicable legislation and that workers can raise concerns without fear of retaliation.
- Requiring suppliers to undertake proportionate due diligence on their own suppliers and subcontractors and to notify the Group of relevant incidents or concerns.
- Escalating concerns to the relevant business owner and Risk Assurance & Compliance for assessment, remediation and, where necessary, consideration of suspension or termination.
- Periodically reassessing suppliers where the risk profile, service, ownership, location or delivery model changes.

Most services are procured through members of the Senior Leadership Team or designated business owners. The Group's direct suppliers are predominantly UK-based and many provide professional or technology services through established businesses. Suppliers of manufactured goods are limited but can include marketing materials, office equipment, technology hardware, facilities consumables, food and drink products and office furnishings.

AREAS OF RISK

The Group operates in the United Kingdom and considers the inherent modern slavery risk within its directly employed workforce and core professional services activities to be low. This assessment does not remove the need for continued vigilance or proportionate due diligence.

The Group recognises that a relatively higher risk may arise in parts of its supply chain involving labour-intensive services, temporary or agency labour, subcontracting, lower-paid work or manufactured products. Relevant areas include facilities management, cleaning, catering, office maintenance, recruitment agencies, marketing production, office equipment and technology hardware.

Controls used to mitigate these risks include:

- Risk-based supplier onboarding and review.
- Contractual obligations addressing compliance, notification and remediation.
- Checks on recruitment agencies and internal recruitment processes.
- Right-to-work and appropriate employment checks.
- Modern slavery and anti-money laundering awareness for employees.
- Whistleblowing and escalation arrangements.

- Enhanced review where a supplier, service, geography or subcontracting arrangement presents heightened risk.

The Group complies with relevant legislation, including the Immigration Act 2016, and undertakes appropriate employment checks. If further or emerging risks are identified, the Group will assess them and take proportionate action to prevent, mitigate or remediate the risk.

APPOINTED REPRESENTATIVES AND BUSINESS PARTNERS

As a mortgage and insurance network, Stonebridge expects its appointed representatives and relevant business partners to conduct their businesses ethically and in accordance with applicable employment and modern slavery legislation. They are expected to take reasonable and proportionate steps to prevent modern slavery and human trafficking within their own operations and supply chains and to raise any relevant concern with the Group promptly.

TRAINING AND AWARENESS

The Group recognises that effective awareness helps employees identify and escalate potential modern slavery risks. Employees receive the Modern Slavery and Human Trafficking Policy and the Whistleblowing Policy, supported by training or awareness materials appropriate to their roles.

Training and awareness may cover:

- The meaning and common indicators of modern slavery and human trafficking.
- Potential risks arising through recruitment, agency labour, subcontracting and supply chains.
- The links between modern slavery, exploitation and money laundering.
- How to respond to and escalate concern, including use of whistleblowing arrangements.
- The importance of avoiding actions that could place a potential victim at further risk.

Additional or targeted training will be considered where a role or activity presents heightened risk or where monitoring identifies a need for improved awareness.

PROCESSES AND MONITORING

The Group monitors the implementation and effectiveness of its modern slavery arrangements through:

- Training completion and policy attestation data.
- Supplier due diligence and onboarding records.
- Review of supplier modern slavery statements where applicable.
- Recruitment agency checks and employee right-to-work records.
- Whistleblowing reports, incidents, allegations and concerns raised.
- Remedial actions and supplier escalations arising from identified concerns.
- Annual review of this statement, the underlying policy and relevant contractual controls.

No incidents of modern slavery or human trafficking were identified within the Group’s operations or reported supply chains during the reporting period. Any allegation or concern will be assessed promptly, investigated as appropriate and escalated in accordance with the Group’s governance and reporting arrangements.

CONTINUAL IMPROVEMENT

During the next reporting period, the Group will continue to review and develop its policies, procedures, systems and controls. Priorities will include:

- Reviewing supplier onboarding and risk assessment arrangements.
- Evaluating the scope and consistency of contractual protections.
- Enhancing employee and business-owner awareness where appropriate.
- Monitoring emerging risks within relevant supply chains and outsourced services.
- Reviewing the effectiveness of controls and recording any lessons arising from incidents, concerns or assurance activity.

BOARD APPROVAL

This statement was approved by the Chief Executive of Stonebridge Mortgage Solutions Limited and will be reviewed annually.

Signed by Robert Clifford (Chief Executive)

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