Cambridge & Counties Bank
Built on understanding

Modern Slavery Act 2015

Our zero tolerance policy May 2026

Modern Slavery Act 2015

Modern slavery remains a significant global and domestic concern, involving a range of exploitative practices such as human trafficking, sexual exploitation, domestic servitude, and forced or bonded labour. These forms of abuse are typically sustained through threats, coercion, deception, violence, or the misuse of power which prevents individuals from freely refusing or escaping the situation.

At its core, modern slavery is a profound violation of fundamental human rights, and we are committed to taking steps to ensure that it has no place within our operation. We therefore maintain a strict zero tolerance approach to all forms of slavery and human trafficking and aim to clearly communicate this to our suppliers and partners. This statement applies to the calendar year ending 31st December 2025.

Links to our previous statements are available here: www.ccbank.co.uk/modernslavery

Our structure, business, and supply chain

We are a UK bank which maintains a strong focus on transparency and integrity across all of our operations. Our business is built on the principles of mutual trust, understanding, and respect. These values continue to guide the way we operate and how we engage with our employees, customers, and wider business partners.

Our team of circa 250 colleagues, located across our offices in Leicester, Sheffield, Reading, and Manchester, play a central role in ensuring our products and services continue to evolve in line with customer expectations. Colleague expertise and their commitment to the business drives our strategic ambitions and contributes directly to the organisation's sustained performance.

Supporting UK-based small and medium sized enterprises (SME's) remains at the heart of our business model. Through a broad range of savings and lending solutions, we help provide the funding that enables these enterprises to grow, innovate, and contribute to economic prosperity at both local and national levels.

For the financial year ending 31st December 2025, we realised turnover of £130m, reflecting contributions from our core businesses of real estate finance, asset finance (to include classic car finance), and savings.

Our policies in relation to slavery and human trafficking

Whilst we assess the risk of such practices within our business model and broader supply chain as low, we recognise the critical importance of addressing remaining risks, and uphold a zero-tolerance stance on modern slavery and human trafficking.

Our Whistleblowing Policy encourages disclosure of any misconduct, violations of laws, regulations or unethical behaviour occurring within our organisation from any person, internal or external with all disclosures thoroughly investigated in accordance with that policy.

We are steadfast in our commitment to doing what we can to help stop human exploitation by acting ethically and with integrity both as a business, and also in all of our business relationships. Our efforts to strengthen our approach are ongoing, and in 2025 we concentrated on:

- the development of a comprehensive supplier code of conduct which is aligned with the Ethical Trading Initiatives Base code. This code now awaits internal stakeholder approval and promotes responsible supply chain, manufacturing, processing and operating practices that incorporate environmental, social, community, and performance goals. It also strengthens our expectations of suppliers in terms of their transparency and accountability.

- maintaining the Bank's status as a B Corp certified organisation. This remains a key priority, alongside closely monitoring and engaging with the development of the B Corp Standards. We are also actively preparing for B Corp recertification in 2027 by building internal awareness and understanding of any forthcoming changes to the Standards. Our B Corp status remains a foundational element of our dedication to high standards of social and environmental business practices and reaffirms our commitment to B Corp standards, which amongst other important issues address those related to modern slavery and human trafficking.
- continued efforts to strengthen our engagement within the B Corp community, alongside an active approach to identifying and working with B Corp certified suppliers that share our values and priorities, including those relating to the prevention of modern day slavery and human trafficking.
- consideration of the updated modern slavery reporting guidance issued in March 2025 which significantly raises expectations in terms of what good compliance with the Modern Slavery Act 2015 looks like. This updated guidance was issued by the UK government in response to the report published in October 2024 by the House of Lords Select Committee which concluded that Modern Slavery Act 2015 is now "too limited to have a significant practical impact".

Our due diligence processes to prevent slavery and human trafficking in our business and supply chain

Our business carefully selects suppliers through comprehensive checks to ensure they meet standards of ethics, stability, suitability, and trustworthiness. Our standard terms and conditions with our suppliers are clear about our zero-tolerance policy against slavery and human trafficking, entitling us to terminate the relationship if there was a modern slavery issue.

Enhanced supplier due diligence is mandatory for those supplier arrangements rated as medium or high-risk and include a compulsory/required section called 'Ethical, Social & Reputational' specifically designed to identify suppliers likely to have potential modern slavery risks. These are reviewed annually and where appropriate a further due diligence assessment will be undertaken.

Over the next year we intend to:

- foster greater understanding across the business of modern slavery and human trafficking. In 2025, we committed to enhancing this understanding through the booking of a comprehensive training course for our procurement function. The course is now scheduled to take place in 2026, and is designed to strengthen awareness of current and emerging human rights and modern slavery risks and to deepen understanding of how these issues can impact supply chains.
- if approved, implement our new supplier code of conduct with our suppliers and thoroughly embed the same into our management of suppliers to further strengthen our approach and commitment to upholding ethical standards and promoting responsible practices across our supply chain.
- consider taking a more proactive approach to engaging with our stakeholders, one idea being to provide an informative document designed to assist our customers in addressing and mitigating the risks of human trafficking and modern slavery within their supply

chains.

- Further consider how to strengthen our approach to supply chain visibility, due diligence and reporting in line with the UK government's evolving expectations which are reflected in the updated, 2025 modern slavery guidance.

The parts of our business and supply chain where there is a risk of slavery and human trafficking taking place, and the steps we take to assess and manage that risk

We assess our supply chain as low risk in terms of the likely incidence of modern slavery and human trafficking because our products are exclusively contractual and financial, with our suppliers primarily delivering office, IT, and consultancy-related goods and services. We also have rigorous supplier due diligence procedures.

We are aware that as a B Corp accredited organisation, their standards have been updated and now include the introduction of the Human Rights Impact Topic, which strengthens expectations around identifying, preventing, and mitigating human rights risks such as modern slavery across operations and value chains.

The new B Corp standards align with the UN Guiding Principles on Business and Human Rights which amongst other obligations require organisations to apply proportionate, risk based due diligence across procurement and supplier relationships. We continue to build our understanding of these evolving requirements as part of our commitment to maintaining B Corp certification and preparing for recertification in 2027.

Our effectiveness in ensuring that slavery and human trafficking is not taking place in our business and supply chains measured against performance indicators

Our Board remains as confident as it can be that modern slavery and human trafficking does not occur within our business or wider supply chain. As a business we remain consistently vigilant in this regard, both in terms of our own conduct and our compliance with the standards set by UK employment law.

We use key risk indicators to measure how well we are doing in different areas of our business. These reflect the Bank's very low risk appetite in respect of suppliers and a zero-tolerance policy to any suppliers in breach of applicable legislation, including a breach of the Modern Slavery Act 2015.

The Company Secretary has taken responsibility for reporting directly to the Board and overseeing the implementation of policies and procedures regarding slavery and human trafficking, including the preparation of this annual statement.

Training about slavery and human trafficking to our staff

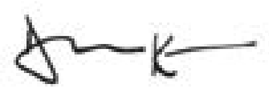
As mentioned previously, all colleagues who work for the Bank complete annual mandatory training which includes questions on what modern day slavery looks like, signs to look out for in our supply chain and actions to take if they believe any kind of wrongdoing is taking place. Colleagues are required to complete and score above a certain percentage to pass.

We'll update you on our progress again next year

In making this statement we have considered all the areas in section 54(5) of the Modern Slavery Act 2015. This statement has been approved by the Board of Directors at a Board meeting on the 21st May 2026 and is signed by the Bank's Chief Executive Officer.

Donald Kerr, Chief Executive Officer
Cambridge & Counties Bank Limited

Date: May 2026



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