

Funding Circle Ltd (06968588)
Modern Slavery Statement

As required by the Modern Slavery Act 2015, this statement describes the approach of, and steps taken by, Funding Circle Ltd and its UK-based affiliates during the financial year ending on 31 December 2025 in relation to the detection and prevention of slavery and human trafficking in our own business and supply chain.

Modern Slavery Statement

We have a zero tolerance approach to modern slavery and human trafficking and we are committed to ensuring that our business operates in a socially responsible way. We are committed to playing our part in helping to improve practices designed to combat slavery and human trafficking in our organisation and in our supply chain.

Our Business

We are a finance platform providing business finance to SMEs in the UK. Since 2010 we have facilitated the extension of c. £17bn in credit to over 125,000 businesses in the UK. We are part of the Funding Circle group and our parent company is Funding Circle Holdings plc.

Our Culture

We are dedicated to implementing and maintaining the highest standards of behaviour, ethics and integrity among our workforce. We have created a culture where adherence to these standards is recognised and rewarded. Our Code of Conduct establishes these standards and addresses subjects such as integrity, conflicts of interest and non-discrimination. Employees are trained annually on our Code of Conduct rules.

We conduct our business at all times in accordance with certain guiding principles which represent the high standards that we set ourselves and exemplify the ethos and values which we seek to inculcate in all of our employees. These include “Being Open” (where we recognise the importance of transparency, treating people well and honestly) and “Think Smart” (where we encourage the asking of questions and positive challenge). We assess employee performance against these principles.

Our Employees

We employ people from a diverse range of backgrounds who all share, and subscribe to, the ambitions and values of our business. All our employees undertake a learning and development programme which includes ongoing training in relation to:

- the regulatory environment in which we conduct our business; and
- the policies, practices and professional standards we adopt.

Where applicable to an employee’s role, financial crime training and procurement training is provided which highlights specifically (among other things) the issues of modern slavery and human trafficking.

The maintenance of professional and ethical standards is extremely important to us and to the way in which we conduct our business. We are committed to creating a culture where adherence to these standards is recognised and rewarded, and employees are aware of the possibility of sanction in the

event of contraventions of, or non-compliance with, them. Our People Team is trained to deal with concerns raised by or about our employees lawfully, promptly and confidentially.

More information can be found in our Code of Conduct and our People Policy summary (People at Funding Circle).

Our Policies, Processes and Procedures

We are committed to act with integrity in all of our business activities and to comply with all applicable laws and regulations to which we are subject. We also have statements and policies in place relevant to modern slavery, which we continuously review and update, and which cover:

- anti-money laundering and counter-terrorist financing, as we recognise that perpetrators of modern slavery may generate profits that would be considered proceeds of crime and/or their actions may constitute money-laundering predicate offences and could also be a source of terrorist financing;
- anti-bribery and corruption, as we recognise that bribery and corruption can also contribute to human rights abuses;
- whistleblowing, which gives everyone in the business access to a whistleblowing process to allow any concerns of wrongdoing to be raised, including any potential issues either internally or with suppliers; and
- procurement.

Where appropriate, these statements and policies are published on our website.

In addition, we have developed standards, processes and procedures including:

- the monitoring and review of the effectiveness of our internal policies and their implementation;
- ongoing supplier risk/impact assessments and due diligence on proposed and existing service providers to mitigate the risk of slavery and human trafficking occurring in our supply chains;
- those to support an inclusive, open and tolerant workplace environment; and
- those relating to the raising of concerns or poor practice by our employees and those with whom we deal.

In 2024 we published our Human Rights Statement, which outlines our approach to human rights in relation to our business, and in accordance with international principles, including through our employment policies and practices, our approach to diversity, equity and inclusion, our supplier assurance and procurement policies, our risk and compliance policies, our customer policies, and our voluntary commitments.

These policies, processes and procedures are regularly reviewed to ensure they are fit for purpose and, where relevant, compliant with the latest modern slavery guidelines.

We provide an external, independent anonymous whistleblowing hotline and website as an additional means for employees to raise concerns relating to human rights, modern slavery, or any other area covered in our Code of Conduct.

Modern slavery assessments form part of our customer KYC standards, with the aim to identify red flags when onboarding customers (borrowers) in the course of KYC and AML checks. Our financial crime risk assessment process includes a standalone modern slavery assessment, which reviews applicable controls and risks, and is refreshed annually.

Our Supply Chain

Our Procurement & Supplier Management Policy outlines key procurement principles and responsibilities and associated policies and procedures, including basic ethics of procurement. Parties involved in the procurement process are required to adhere to ethics, including on Human Rights and Modern Slavery. We apply The Chartered Institute of Purchasing and Supply (United Kingdom & Central Europe) CIPS Code of Conduct.

Our supply chain service partners principally involve suppliers of technology, data, office and facilities supplies, and professional advisory firms, amongst others. We undertake detailed due diligence on proposed suppliers to ensure that they are a suitable organisation with which to do business, which includes:

- Assessing the selection, management and geographical location of their employees;
- The selection and management of their sub-contractors and their supply chain, including their own background and reference checks, as well as any disputes they might have had in the past; and
- Their commitment to corporate social responsibility, ensuring proper policies and practices are in place, where applicable.

We are committed to acting ethically in all our business relationships and implementing and enforcing effective systems and controls which make it clear that we do not tolerate slavery and/or human trafficking within our supply chains and would seek to terminate any relationship with a supplier where evidence of the same occurred. We publish our Supplier Assurance Standard and our Supplier Code of Conduct on our website to provide more transparency and clarity on these matters for stakeholders and suppliers.

Given the nature of our business, we do not consider that we operate in a sector where modern slavery and human trafficking are particularly prevalent or of high risk, however a small proportion of our service providers have business operations within geographical locations that do represent an elevated risk, and as part of our procurement process we ask suppliers for their Modern Slavery Statement where applicable. Any suppliers who do not provide a Modern Slavery statement are added to our Risk Register, and monitored in accordance with our supplier risk assessment process. We utilise a supplier assurance programme that is designed to provide reasonable assurance that our supply chain services partners comply with, and are aligned to, our values and our commitment to ensure that there is no slavery or human trafficking arising in our supply chains or in any part of our business, and are assessed on this basis during the procurement process. We utilise a formal Supplier Relationship Management tool, which features risk specific modules to document supplier risk in a centralised place. This allows us to monitor and re-assess supplier risk on a periodic basis to ensure Funding Circle is upholding the highest standard possible. A Supplier Risk Sub Committee meets monthly to ensure that our risks are correctly prioritised and our actions are targeted to address these risks for maximum impact.

Funding Circle Holdings plc is a member of the UN Global Compact (UNGC), which formalises our alignment with its Ten Principles on human rights, labour, the environment and anti-corruption. We look forward to continuing to integrate the UNGC principles into practices around modern slavery and human trafficking, and leveraging this framework to help guide our efforts in the future.

At the time of this Statement's publication, no instances of Modern Slavery have been identified.

Approved by the Funding Circle Ltd Board and signed on its behalf.



.....
Lisa Jacobs, Director

23 April 2026