

Slavery and Human Trafficking Statement 2025/2026

Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps the Company has taken and will consider during the financial year 2025/2026 to prevent modern slavery in its business operations and supply chains.

As part of the Financial Services Industry the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking, contributing to combatting such global practices.

Although the Company considers its operations to be low risk overall, steps have been taken to review the risk of modern slavery occurring, and will continue to take steps, as outlined below, to ensure all its colleagues and suppliers are aware of their responsibilities under the Act, and to be alert to the risks of modern slavery.

Organisational structure and supply chains

This statement covers the activities of the Company which includes managing portfolios of residential and lifetime mortgages secured on properties in the UK and unsecured loans. Activities also include master servicing on the Company's own books. The Company is currently closed to new lending and does not operate outside the UK. As such, the risk of human trafficking within our business is assessed as being low.

There is a robust recruitment process in place which ensures where new employees are recruited through agencies, these are reputable agencies with whom terms and conditions are agreed in advance. Pre-employment checks are carried out in line with FCA requirements.

In addition, the Company has mapped and documented its suppliers and has issued statements and guidelines regarding its policies, processes and expectations. All suppliers, with a turnover of £36m+ are required to be compliant with the Modern Slavery Act. The requirement to declare their commitment to eradicating modern slavery within their own businesses and supply chains is explicit in the Company's Vendor Management Framework.

The Company will continue to document and monitor new suppliers and to ensure suppliers are aware of their obligations. Any risks will be investigated, and appropriate remedial actions taken.

The Company undertakes Operational colleague training in relation to recognising potential indicators of modern slavery in its vulnerable customer population, to train on

internal reporting processes and to ensure staff are aware of various sources of assistance available.

High-risk activities

The Company has carried out an assessment of organisational activities in 2025 and none are assessed as high risk due to the size and maturity of the mortgage portfolio. The Company has, however, recognised the opportunity to further develop customer facing colleagues' awareness of the indicators of modern slavery and its processes for dealing with potential concerns.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** A Modern Slavery Policy has been developed. Ultimate responsibility for this policy lies with the Executive Committee. Responsibility for reviewing this policy lies with the CEO and responsibility for monitoring with the Head of Risk and Compliance. The requirement to be cognisant of modern slavery and committed to eradicating modern slavery in our supplier's businesses forms an explicit part of our Vendor Management Framework.
- **Risk assessments:** The Executive Team has collectively discussed and assessed the risk of modern slavery occurring within the business and its supply chains and although it is recognised the risk of modern slavery occurring is not impossible via, for example, money laundering activities or through ancillary services, it is not thought that there are high risk activities taking place with the governance in place within the business. This will be reviewed annually. The requirement for new suppliers with a turnover of £36m+ to be compliant with the Modern Slavery Act is included in the Company's Vendor Management Framework.
- **Investigations/due diligence:** Compliance or HR Support has responsibility for investigating potential instances of modern slavery. Due diligence processes are the responsibility of the Executive Committee, and all colleagues have a responsibility for being alert to the possibility of modern slavery and for reporting concerns or instances appropriately. Clear processes are in place for dealing with identified instances of modern slavery and for raising concerns in relation to the possibility of modern slavery.
- **Training:** New colleagues undergo induction, and all colleagues undergo annual training on relevant topics including Modern Slavery, Financial Crime, and anti-money laundering, together with training on Company internal processes. Both the Modern Slavery Policy and the Whistleblowing Policy are available to all colleagues and refreshed as necessary. Information includes how to escalate potential slavery or human trafficking issues to the relevant parties within the business and the availability of external advice and help, for example, through the Modern Slavery Helpline, Gang masters and Labour Abuse Authority and the "Stronger together" initiative.

Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation or retribution. Employees, customers, or others who have concerns can make a protected disclosure via the Non Executive Director (Hitesh Patel) either in person, by telephone or in writing.
- **Colleague Handbook:** The Company's handbook makes clear to employees the actions and behaviour expected of them when representing the organisation. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Supplier Code of Conduct:** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate on request that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour. Serious violations will lead to the termination of the business relationship. External suppliers with a turnover of £36m+ are asked to sign a declaration that they understand and are fully compliant with the company policy and procedure on Modern Slavery, or to provide a copy of their own policies and processes.
- **Recruitment Procedure:** The Company uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency. The business has assessed the risk in relation to our recruitment policies and practices and has assessed the risk to be low.

Due diligence

The Company undertakes due diligence when considering taking on new suppliers with a turnover of £36m+, and periodically reviews its existing suppliers. The organisation's due diligence and reviews include:

- contacting suppliers to enquire about their modern slavery practices on a periodic basis as part of the reviews carried out in accordance with to the Vendor Management Framework;
- committing to conducting supplier audits or assessments where specific risks are identified; and
- being prepared to invoke sanctions against suppliers that seriously violate our supplier code of conduct, including the termination of the business relationship.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Measure Effectiveness of LML's Modern Slavery Policy

The Company measures its effectiveness and ensures that slavery and human trafficking are not taking place in its business and supply chains.

- We will contact suppliers to enquire about their modern slavery practices on a regular basis, in line with reviews carried out according to the Vendor Management Framework.
- We will audit our employee and worker files to ensure that the right of work is up-to-date and has been completed correctly.
- We will periodically assess compliance with the Policy as part of our assurance activities.
- We will capture any breaches of the Policy as Risk Events and escalate as appropriate.

Compliance

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Colleagues will receive training to be aware of the possibility of modern slavery. Landmark maintains a culture where the highest standards of ethical behaviour are expected and rewarded, and where it is easy to report concerns in relation to modern slavery, money laundering and associated risk indicators.

You must notify your Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any part of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your Manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your Manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or any part of our supply chain. If you believe you have been subjected to such treatment, please inform your manager immediately.

Communication and Awareness

Training on this policy, and on the risk our business faces from modern slavery in its supply chain, will be given where needed.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Policy Breaches

Any employee who breaches this policy may face disciplinary action, up to and including dismissal.

We may terminate our relationship with other individuals and organisations working with us or on our behalf if they breach this policy

Board approval

This statement has been approved by the organisation's Board of Directors, and it will be reviewed and updated annually on behalf of the Board.

CEO signature:

CEO name: Lee Kelly

Date: March 2026