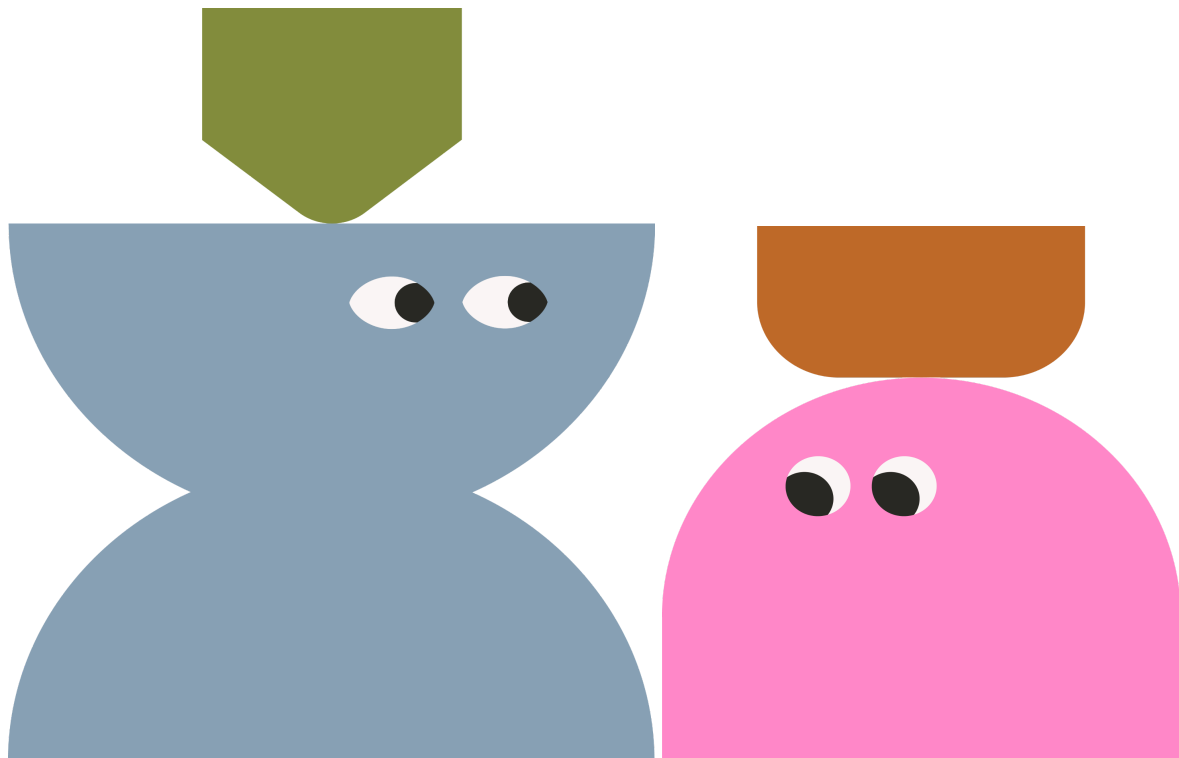


Anti-Slavery and Human Trafficking Policy





Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, in order to exploit someone for personal or commercial gain.

Marshmallow Financial Services Limited (“**MFSL**”) is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

MFSL’s own ethical standards include providing fair wages, ensuring safe working environments, and respecting the rights of all individuals in our workforce. We prohibit child labor, forced labor, and any form of exploitation or coercion.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

Scope

Marshmallow Group comprises Marshmallow Insurance Limited (“**MIL**”), Marshmallow Financial Services Limited (“**MFSL**”) and Marshmallow Technology Limited (“**MTL**”).

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, temporary workers, volunteers, interns, contractors, external consultants, third-party representatives and business partners. It covers all forms of modern slavery, including but not limited to:

- Slavery
- Servitude
- Forced labor
- Human trafficking
- Child labor
- Coercion or exploitation

This policy does not form part of any employee's contract of employment and we may amend it at any time.



Purpose

The purpose of this policy is to set out our responsibilities, and the responsibilities of those working for, and on our behalf, in observing and upholding our position on modern slavery and human trafficking, and provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

Modern Slavery Act 2015

The Modern Slavery Act 2015 is legislation in force in the United Kingdom which is designed to tackle modern slavery and human exploitation. The Act seeks to identify and protect victims, prosecute offenders, and increase transparency in supply chains to ensure businesses are not knowingly or unknowingly complicit in modern slavery practices.

Key aspects of the Act include:

1. **Transparency in Supply Chains:** Businesses with a turnover of over £36 million to publish a statement each financial year, outlining the steps they have taken to ensure slavery and human trafficking are not taking place in their supply chains or operations.
2. **Offense of Modern Slavery:** The Act consolidates existing slavery offenses and introduces a single offense of modern slavery. This covers slavery, servitude, forced or compulsory labor, and human trafficking. The penalties can include life imprisonment.
3. **Victim Protection:** The Act provides mechanisms for supporting victims. An Independent Anti-Slavery Commissioner was established in addition to the ability for authorities to issue "Slavery and Trafficking Prevention Orders" to restrict the activities of convicted offenders.
4. **Forfeiture of Property:** Through the Proceeds of Crime Act, the Act Modern Slavery Act enables the confiscation of assets from individuals involved in modern slavery practices.
5. **Business Responsibility:** The Act encourages companies to become more accountable and proactive in preventing exploitation within their operations and supply chains.



Employee and Stakeholder Responsibilities

You must ensure that you read, understand and comply with this policy.

We believe that raising awareness and providing appropriate training is essential in combatting modern slavery. We are committed to:

1. Educating employees to identify potential signs of modern slavery and understand your in preventing it.
2. Encouraging reporting, creating an environment where employees feel safe reporting any concerns related to modern slavery, without fear of retaliation.
3. In cases where modern slavery is suspected, we will notify and cooperate with law enforcement and relevant authorities to investigate and take appropriate action.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains 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.

You must complete all training allocated to you, in a timely manner and utilise the skills and knowledge acquired during the training to identify and mitigate possible modern slavery risk.

You must notify the Head of Compliance as soon as possible if you believe that a breach of this policy has, or may occur in the future. You are encouraged to raise all concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

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

As an organisation, MFSL 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 in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.



If you believe that you have suffered any such treatment, you should inform the Head of Compliance immediately. If the matter is not resolved, and you are an employee, you should raise it formally using our Grievance Procedure.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

Risk Assessment & Due Diligence

Whilst we recognise that the risk of modern slavery may be higher in certain industries and sectors such as agriculture, construction and hospitality, within which MFSL do not directly operate, we understand that interactions with some third party suppliers and/or partners may expose MFSL to high risk industries. Furthermore, MFSL understands that the industry within which we trade is not immune to such grotesque practices.

As such, we will take the following steps to assess and mitigate modern slavery risks:

- **Risk Assessments:** Prior to engagement with a third party or prospective partner, we will carry out a risk assessment to identify potential risks the business may pose. This will include (but is not limited to) ascertaining any geographical risks, identify high risk roles within the organisation and the organisations approach to modern slavery.
- **Supplier due diligence:** We will assess suppliers and business partners based on their practices, including requiring them to provide information on their anti-slavery and human trafficking policies and practices,
- **Supplier commitments:** We will ask suppliers to adhere to our supplier code of conduct that commits them to take active steps to prevent modern slavery within their operations,
- **Contractual obligations:** Our contracts with suppliers will include clauses requiring compliance with this policy and obligations to notify us if modern slavery is suspected or identified,
- **Ongoing monitoring:** We will regularly review and audit our supply chains and operations to assess the effectiveness of our anti-slavery measures and ensure compliance,
- **Continuous improvement:** We will work with suppliers to improve our mutual practices where necessary and provide guidance to help eliminate any risks related to modern slavery.



Breaches of this Policy

Any employee in breach of this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may also terminate our relationship with other individuals and organisations working on our behalf should they be in breach of this policy.

Review and Continuous Improvement

As our business grows, so too will our requirement for third party outsourcing and partnerships and it is essential to ensure MFSL's modern slavery policy and practices remain effective, comprehensive and agile.

We will conduct an annual review that will involve key stakeholders across the business including compliance, HR, procurement, and legal department. The review will focus on assessing gaps in policy coverage, evaluating the effectiveness of current controls and measures, and will ensure compliance with evolving legal standards. Based on the review, we will implement updates to strengthen our policy and practices where appropriate.

We will publish our annual Modern Slavery Statement to ensure transparency with both internal and external stakeholders

Related Resources

1. Whistleblowing Policy
2. Financial Crime Policy
3. Anti-bribery & Corruption Policy
4. Modern Slavery Survivor Support
5. Supplier Code of Conduct
6. ED&I Policy
7. HR Policy
8. Disciplinary & Grievance Policy