

## Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the Act). It sets out the actions taken by Unity Trust Bank plc (Unity) in the year ending 31 December 2025 to identify and address modern slavery in its supply chain or any part of its business. The steps outlined below relate to Unity's business and primary supply chain, providing details of the diligence taken with its direct first tier suppliers and employees.

## About Unity

Unity was founded by Trade Unions and the Co-operative Bank in 1984 to serve the common good and make sustainable economic returns. Working together with like-minded organisations that share its values, Unity offers commercial banking to businesses that address social, economic, and environmental needs in local communities. In doing so, Unity aims to deliver on the following purpose:

- to be the bank with a social conscience.
- to provide banking services to viable organisations, sole traders or individuals that contribute community, economic, social, or environmental benefit to society, including, but not limited to, Trade Unions, co-operatives, charitable and commercial enterprises; and
- to achieve sustainable returns for itself and its members as well as a social benefit. This is described as a "double bottom line" approach to all business Unity does.

Unity provides banking services to small and medium sized organisations in the UK with approximately 300 employees working from offices in Birmingham, Manchester, and London. It provides services through a national network of relationship managers and supports customers through online and contact centres.

As a financial services institution, Unity does not manufacture foods, manage raw materials or commodities. The Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA) regulate Unity.

Further information on Unity's purpose, ambition and strategy is detailed in the latest Annual Report and Accounts which can be found on its website. Please visit [www.unity.co.uk](http://www.unity.co.uk) for more information.

## Policies and procedures

Unity is committed to ethical and compliant behaviours, and this is integrated into its policies, procedures, and overall business practices.

The key policy areas impacted by modern slavery are human resource management and third-party supplier management. Specifically, modern slavery is addressed by:

### *Human Resource Management*

- Unity's Code of Conduct, underpinned by the core values of Collaborative, Integrity, Inclusive, Straightforward, Bold, defines the behaviours and standards required from all employees.
- People policies are designed to provide equal opportunities and create an inclusive culture, in line with Unity's values, employment law and in support of its long-term success.
- Unity's speaking up framework facilitates a working environment and culture where everyone feels safe, experiences a sense of belonging, and where every colleague has a voice without fear of consequence.
- Policies and channels, including whistleblowing, allow anyone who has a concern to raise it anonymously and safely. All concerns are taken very seriously, and Unity investigates any matters raised and, where relevant, appropriate action is taken.

### *Third-party Supplier Management*

- The Anti-Money Laundering (AML) policy sets out the minimum control requirements designed to ensure that Unity complies with the obligations set out in relevant legislation, regulations, and industry guidance for the financial services sector. This includes the requirement to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate financial crime. Money laundering and modern slavery are interconnecting crimes. Criminals often use money laundering to fund their illicit activities, including human trafficking.
- The Supplier Code of Conduct, outlines the standards that Unity expects its suppliers to adhere to, including on human rights and modern slavery related issues.

### **Risk assessment and due diligence**

Unity operates a straightforward business model with a relatively simple supply chain, primarily sourcing goods and services from the UK with no goods or services sourced from high-risk countries. This simplicity assists Unity in monitoring risks of modern slavery.

Unity performs risk assessments and due diligence procedures when entering relationships to ensure that slavery and human trafficking do not take place. Regular reviews of supplier relationships are conducted on a risk-based approach to address any material changes within the supply chain and in line with third-party management standards.

Unity's assessment of exposure to the risk of modern slavery is embedded within a comprehensive overall risk assessment and is not conducted separately. Given its size, structure, location, and supply chain, this approach provides a proportionate response to potential risks. Unity keeps this approach under constant review as it changes in size and complexity.

Whilst Unity believes there is a minimal risk within its business operation, the most salient risk of encountering modern slavery lies where Unity does not have direct management control or direct engagement downstream in its supply chain. This may include suppliers that provide support staff in, for example, catering, cleaning or security posts. Unity requires policies and procedures for suppliers as detailed below to reduce this risk.

Unity integrates assessments of modern slavery management in the loans it provides to customers. This includes assessing whether customers have public policies, procedures, and safeguards in place.

### **Employees**

Unity's Talent team follows the Recruitment and Selection Policy in vetting candidates for new roles. This process includes assessing the candidate's legal right to work in the UK, proof of identity and address verification, reducing the risk of hiring individuals who are being forced to work.

Unity's Code of Conduct sets out that Unity fully supports the right of all potential or existing employees to work in an environment free from any form of harassment or intimidation. This commitment to respecting human rights in the workplace is evident in Unity's [values](#) as well as its human resources policies and procedures.

Unity fosters a working environment where employees can be confident that their views are encouraged, and their concerns are addressed. Unity has multiple channels in which employees can speak up, including regular one-to-one's, access to mental health first aiders, as well as regular employee engagement surveys. Further, the Whistleblowing Policy allows its employees to raise concerns where the normal channels may be inappropriate. It is designed to ensure that employees can raise concerns about wrongdoing or malpractice within Unity without fear of victimisation, subsequent discrimination, disadvantage, or dismissal.

Concerns are resolved fairly and without retaliation, with conduct that does not conform to Unity's standards treated as a serious violation of its values and policies. Appropriate disciplinary action, which may include termination of employment, is taken against those who engage in poor conduct.

### **Suppliers**

Unity requires suppliers to respect the human rights of their employees and the communities they operate in. Through its Third-Party Management Standards, Unity challenges prospective suppliers to provide evidence of the policies and procedures they follow to prevent modern slavery.

Prospective suppliers are also challenged on their commitment towards the National Living Wage. As an accredited Living Wage employer, Unity reviews contracts with suppliers, including those in high-risk sectors such as cleaning services, with the aim of helping them commit to and meet the Living Wage standard.

Unity requires that suppliers demonstrate ongoing compliance with those policies including applicable laws and regulations.

The Third-Party Supplier Management Standards also set out the minimum evaluation measures of due diligence required when Unity enters into new contractual agreements. The level of due diligence depends on Unity's risk assessment considering the type of supplier arrangement and value of the contract. As appropriate and in line with this assessment, Unity will ask prospective suppliers to confirm they are aware of their responsibility under the Act and to demonstrate their compliance.

Unity's policy is to pay suppliers within 30 days. Unity continues to report to the UK Government on supplier payment timelines, and on average, pays suppliers in 19 days.

### Performance indicators and reward

Unity understands that financial pressures or unreasonable delivery targets may unintentionally increase pressure on employees and suppliers which can result in modern slavery. As such, Unity enters negotiations with a view to achieving a fair deal with reasonable expectations and fair, timely compensation for both employees and suppliers.

Unity's remuneration policies are designed to pay its employees fairly and to attract, retain and motivate the best people, regardless of gender, ethnicity, age, disability, or any other factor unrelated to performance or experience.

Unity is a Living Wage Accredited employer – the first bank in the UK to achieve this award. Being a Living Wage employer means that Unity pays each of its employees a rate on or above the National Living Wage. The Living Wage is set on an annual basis and is significantly above the National Minimum Wage. The amount reflects the calculated cost of an acceptable standard of living. Unity's commitment to paying the Living Wage stretches beyond its staff, to include subcontractors such as cleaners. In addition, Unity holds the Investors in People (IIP) Gold status in recognition of the value it places on its employees and their training and development.

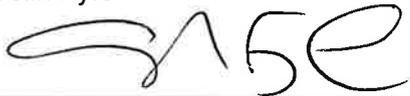
### Training

Unity continues to invest in the development of all colleagues through a range of opportunities to learn and grow within the Bank. New colleagues complete an Essential Learning Path which is underpinned by legal and regulatory requirements, including Modern Slavery. Existing colleagues take part in Excellence Pathways which ensure regulatory knowledge and approaches are revisited on a regular basis, and reflective of current regulatory and legal expectations. Unity's Modern Slavery module focuses on identifying indicators of modern slavery and applying reporting procedures effectively. Other legal and regulatory resources available include Whistleblowing, Preventing Sexual Harassment, Anti-Money Laundering and the Failure to Prevent Fraud.

### Governance

This statement was approved by the Board of directors on 5 March 2026 and signed off on behalf of the Board by Colin Fyfe.

Colin Fyfe



CEO

Unity Trust Bank

05.03.2026

Date