

## Group modern slavery policy (“the Policy”)

### 1. INTRODUCTION AND DEFINITIONS

This policy provides guidance for The Housing Finance Corporation Limited as well as its subsidiaries and managed companies (together, the ‘Group’).

For the purposes of this policy, ‘employee’ includes all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries.

For the purposes of this policy, ‘modern slavery’ includes slavery, servitude, forced or compulsory labour and human trafficking, as defined in the Modern Slavery Act 2015.

### 2. RESPONSIBILITY FOR THIS POLICY

The board of directors has overall responsibility for ensuring this policy complies with the Group’s legal and ethical obligations and that all Group entities and employees comply with it.

The Chief Executive has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the Policy and the issue of modern slavery in supply chains.

This policy is supported by the Group’s annual modern slavery statement, which is approved by the Board and published each financial year in accordance with section 54 of the Modern Slavery Act 2015.

### 3. COMPLIANCE WITH THIS POLICY

Employees must ensure that they read, understand and comply with this policy.

The Group has systems in place to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Protect whistle blowers.



The prevention, detection and reporting of modern slavery in any part of the Group or its supply chains is the responsibility of all employees. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Group or its supply chains at the earliest possible stage.

If an employee believes or suspects that a breach of this policy has occurred or that there is a risk of a breach occurring, then it must be reported in accordance with our Whistleblowing Policy as soon as possible. If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Group's supply chains constitutes any of the various forms of modern slavery, it should be reported.

The Group encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Group is 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 the organisation or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should inform Human Resources immediately. If the matter is not remedied, an employee should raise it formally using our Grievance Procedure.

This policy does not form part of an employee's contract of employment and may be amended at any time.

The Group will monitor the effectiveness of this policy by tracking, among other things, completion of training, the number and nature of concerns raised, and supplier responses to modern slavery due diligence.

## 4. RISK ASSESSMENT AND DUE DILIGENCE

The Group has undertaken an organisation-wide risk assessment to assess the nature and extent of the Group's exposure to modern slavery. It has been concluded that the Group's risk is low; however, due diligence is undertaken proportionate to this risk. The Group asks all suppliers to provide their published Modern Slavery Statements as evidence of their commitment to eradicate this violation of human rights.

Smaller suppliers, who are not required to maintain a statement by law, are asked to demonstrate their commitment to The Group's modern slavery policy.

In line with emerging expectations for the financial services sector, the Group will also take account of modern slavery risk, where relevant and proportionate, in its lending and investment due diligence and ongoing relationship management.



## 5. TRAINING AND AWARENESS

The Group is committed to providing training on this policy and on the risks faced from modern slavery both within the Group and in its supply chains. Training on this forms part of the induction process for all employees, and regular training will be provided as necessary.

The Group's commitment to addressing the issue of modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

## 6. BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.

The Group may terminate its relationship with other individuals and organisations working on behalf of the Group or any part of the Group if they breach this policy.

## 7. REVIEW OF THIS POLICY

This policy will be reviewed at least annually, or more frequently if required, to reflect legal or best-practice developments. The Board (or a delegated Board committee) will oversee the review and approve any material changes, alongside consideration of the Group's annual modern slavery statement.

Approved by the Board on 4 March 2026.