Lloyds Wealth Management Limited Modern Slavery Statement

LLOYDS
WEALTH

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Opening statement

Lloyds Wealth is committed to combating modern slavery and human trafficking in all aspects of our operations and supply chains. We recognise the responsibility we have towards our clients, stakeholders, employees, and society, which drives us to ensure that no form of modern slavery or human trafficking is present in our business or supply chain. Our Executive Committee is dedicated to ensuring that Lloyds Wealth's policies and procedures fully comply with the UK Modern Slavery Act (2015). This annual Modern Slavery Statement covers the financial year ending 31 December 2025 and details the strides we made in 2025 towards eradicating modern slavery and human trafficking from our organisation and supply chain.

Organisational Structure

Lloyds Wealth Management Holdings Limited, "Lloyds Wealth" is a wholly owned subsidiary of Scottish Widows Group Limited. It is comprised of two operating entities authorised and regulated by the Financial Conduct Authority: Lloyds Wealth Management Limited and Lloyds Wealth Management (ACD) Limited. Lloyds Wealth provides restricted financial advice and associated investment management services to retail clients across the United Kingdom. We deliver these services through our team of qualified financial advisers who develop personalised financial plans for our clients. Our client-facing teams are supported by colleagues in our central support functions, who are also based in the UK. In addition to our internal operations, we procure services from third-party suppliers, as described in the following sections.

Supply chains

We acknowledge that while the direct risk of modern slavery within our office-based workforce is low, the greatest exposure lies within our supply chains. We are vigilant when sourcing goods and services, ensuring they come from ethical suppliers that meet our standards of conduct. By the end of 2025, Lloyds Wealth's supplier base comprised approximately 160 suppliers, primarily in professional services sectors such as management consultancy, human resources, information technology, marketing, and communications. About 95% of these suppliers are based in the United Kingdom, with the remainder located in Europe, India, South Africa, or North America.

We recognise particularly higher risks of modern slavery in certain industries, such as cleaning, catering, property management, and security services, especially when such services are outsourced. To better control and monitor potential risks in these areas, we have consolidated those services under a single, long-term managed service agreement. This consolidation provides stronger oversight and helps ensure consistent enforcement of our standards across these suppliers. Additionally, our primary service provider operates an Ethics Helpline that enables all staff, subcontractors, and employees to report any concerns regarding wages, labour practices, or potential violations of employment laws (including modern slavery indicators) in confidence. All such reports are recorded independently and investigated thoroughly to ensure that any issues are addressed in line with our zero-tolerance approach to exploitation.

Supply Chain Due Diligence Activities

Lloyds Wealth mitigates supply chain risks through rigorous due diligence during supplier onboarding and throughout the supplier relationship lifecycle. Our key due diligence activities include:

- **Completion of Risk Ledger:** We use Risk Ledger, a managed third-party qualification system that ensures a standardised approach to compliance and assurance in our supply chain. All prospective suppliers are required to complete a comprehensive questionnaire validating their adherence to industry best practices, our internal standards, and regulatory requirements. Within the Environmental, Social, and Governance (ESG) section of this questionnaire, suppliers must confirm whether they have their own modern slavery statement or policy and report any modern slavery or human trafficking incidents in the past 12 months. Any non-compliant or concerning responses automatically trigger an investigation and resolution process led by our Sourcing Managers before a contract can be signed. Moreover, if serious issues are identified during annual supplier reviews, we will re-evaluate the business relationship and may consider amending contract terms or terminating the contract to protect our standards.

- **Legal Contracts:** We manage contractual risk by employing standardised terms and conditions in our supplier contracts, ensuring consistency across our supply base and minimising variations between agreements. These standard contract terms include explicit clauses requiring suppliers to affirm that neither slavery nor human trafficking exists in their business or supply chain, and that they will comply with the Modern Slavery Act. Additionally, we prohibit key suppliers from subcontracting work without Lloyds Wealth's prior consent, allowing us to maintain visibility and control over sub-suppliers and their labour practices throughout our supply chain.
- **Supplier Code of Responsibility (SCOR):** To communicate our ethical sourcing expectations clearly, we have created a Supplier Code of Responsibility, which defines the standards and behaviours we require from all our suppliers. All new suppliers must formally attest to complying with the SCOR before we award them any business, and all existing suppliers are asked to reconfirm their adherence to SCOR principles on an annual basis. The SCOR focuses on six fundamental principles:
  - human rights;
  - health and safety;
  - supply chain (labour standards in their supply chain);
  - inclusion and diversity;
  - doing business responsibly; and
  - doing business sustainably.

We are pleased to report that 100% of our suppliers have attested to our SCOR requirements, and we have been encouraged by positive feedback from our partners in the supply chain regarding these standards. Our goal is to work with suppliers who share our responsible business values and purpose, using our purchasing power in a way that benefits society and the environment. To this end, we actively engage with our suppliers to understand and support their positive contributions to ethical and sustainable business practices.

Human Rights Due Diligence

Strong internal policies and processes are fundamental to promoting a culture of respect for human rights within our organisation. All Lloyds Wealth colleagues are required to familiarise themselves with our policies during onboarding and regular training, embedding a clear understanding of our zero-tolerance stance on modern slavery and related abuses.

- In particular, our Whistleblowing Policy is emphasised through annual mandatory training, and it serves as a critical tool for safeguarding human rights and ethical conduct in our workplace. This policy encourages all employees to report any unsafe, unethical, or unlawful actions (including concerns about modern slavery) without fear of reprisal. Lloyds Wealth has zero tolerance for any actions that prevent or discourage our colleagues from speaking up, and we will not tolerate management inaction regarding known issues. Colleagues who impede reports of wrongdoing, or managers who fail to act on reported issues, may face formal disciplinary action under the Company's procedures. To facilitate reporting, Lloyds Wealth provides a confidential Whistleblowing Service through our independent partner, Navex. This service allows employees, contractors, and third parties to report concerns securely, with the option to remain anonymous. We promote an open and honest culture, and all genuine concerns raised will be taken seriously and addressed, with full support given to the individual reporting the issue.
- We also enforce robust anti-harassment and anti-discrimination policies to ensure a safe and fair working environment for all colleagues. Our Anti-Harassment and Anti-Bullying Policy and Sexual Harassment Policy provide clear guidelines for preventing and addressing inappropriate behaviour in the workplace. These policies affirm Lloyds Wealth's commitment to a positive working environment and protect colleagues by enabling them to raise concerns of bullying or harassment without fear of reprisal.

- In addition, Lloyds Wealth upholds strict employment practices to prevent exploitation. We apply thorough vetting standards for all permanent and non-permanent staff (including temporary staff and contractors) to ensure all personnel meet our integrity and compliance requirements. We also require all our recruitment agency partners to include Modern Slavery and Anti-Bribery clauses in their contracts, aligning our hiring practices with our anti-slavery commitments.
- Ethical sourcing is at the heart of Lloyds Wealth's Sourcing and Supplier Management strategy, which focuses on fair treatment of workers, safe working conditions, minimising environmental and social impacts, and adherence to strict standards throughout our supply chain.

Training & Materials

Lloyds Wealth continuously refines and updates its modern slavery training materials to address emerging risks. Our training programmes ensure that all employees are equipped with up-to-date knowledge of the key facts and understand the reporting procedures related to modern slavery and human trafficking. We believe that well-informed colleagues are better prepared to identify potential instances of exploitation and act swiftly. Furthermore, employees in specific roles, such as those in Sourcing and Supplier Management or other positions closely involved with suppliers, receive specialised training on the requirements of the UK Modern Slavery Act and the particular risks associated with supply chain management. This targeted training enhances our team's ability to detect, prevent, and manage any issues of modern slavery in our operations or supplier engagements.

Key Performance Indicators

Measuring the effectiveness of our efforts to combat modern slavery is challenging, but we remain committed to transparency and continual improvement. We use a set of Key Performance Indicators (KPIs) to track our activities and progress. Below is a summary of key metrics for 2025, with comparative data going back 5 years, illustrating our sustained commitment and the progress we have made over time:

KPI	2025	2024	2023	2022	2021
Reported instances of modern slavery (in Lloyds Wealth's operations or supply chain)	Zero	Zero	Zero	Zero	Zero
Training Completion Rates	100% 763 Colleagues	100% 819 Colleagues	100% 837 Colleagues	100% 874 Colleagues	100% 785 Colleagues
Suppliers who have agreed to our Supplier Code of Responsibility (SCOR)	100% 158 Suppliers	100% 200 Suppliers	100% 191 Suppliers	100% 169 Suppliers	100% 140 Suppliers
Number of modern slavery due diligence questionnaires assessed and approved for Tier 1 suppliers	100% 17 Tier 1 Suppliers	100% 17 Tier 1 Suppliers	100% 15 Tier 1 Suppliers	100% 18 Tier 1 Suppliers	100% 18 Tier 1 Suppliers
Number of suppliers who have not adopted our approach and/or agreed to corrective actions:	Zero	Zero	Zero	Zero	Zero

Achievements in 2025

During 2025, Lloyds Wealth made significant progress in strengthening our anti–modern slavery measures and responsible business practices. Key achievements include:

- **100% Supplier Attestations to SCOR:** We obtained confirmation from all our suppliers, including all critical Tier 1 suppliers, that they have formally attested to our Supplier Code of Responsibility (SCOR). These attestations verify that each supplier's mission and purpose align with Lloyds Wealth's SCOR principles. We also validated that our suppliers provide appropriate education and training on modern slavery to their employees and within their own supply chains, and that they have whistleblowing mechanisms in place to ensure any modern slavery concerns can be reported and addressed.

- **Good Business Charter Re-accreditation:** We successfully maintained our accreditation with the Good Business Charter by continuing to fulfil all ten of its responsible business criteria. This re-accreditation reflects our ongoing commitment to operate ethically and transparently across all areas of our business.

- **Real Living Wage Employer Status:** Lloyds Wealth was re-accredited as a Real Living Wage Employer, which means that every one of our colleagues, as well as all third-party contractors working on our behalf, earns at least the real Living Wage in the UK. This demonstrates our commitment to fair compensation and working conditions for all staff.

- **Fair Tax Mark:** We remain fully committed to sustainable tax practices and paying our fair share of taxes. In 2025, we were proud to receive re-accreditation of the Fair Tax Mark. This recognition by the Fair Tax Foundation underscores our dedication to transparency and responsibility in our tax affairs.

- **Fair Employment Practices:** We do not employ any colleagues on zero-hours contracts and we remain committed to fair and equitable employment terms, including providing stable contracts, fair working hours, and reasonable shift scheduling for all our staff.

- **Fair Payment Code:** As a current Gold Award holder under the Fair Payment Code for our payment practices, our metrics in 2025 continue to evidence our commitment to paying our suppliers in a timely manner:

  - 97 % of all invoices were paid within 30 days:
  - 98 % of small business invoices (<50 colleagues) were paid within 30 days; and
  - 24 average days to payment.
  - These achievements illustrate the concrete steps Lloyds Wealth has taken in 2025 to uphold high ethical standards, support workers' rights, and promote transparency and fairness in our business and supply chain.

Focus for 2026

Over the next 12 months (the 2026 financial year), Lloyds Wealth will continue to assess areas of potential risk in our supply chain and take prompt action whenever a compliance issue or breach related to modern slavery is identified. Key areas of focus include:

- **Enhanced Training and Awareness:** Continuing to increase modern slavery awareness and understanding among our colleagues by providing targeted training for those involved in the procurement process and supplier management. This will ensure that employees most engaged with suppliers are equipped to identify and address modern slavery risks effectively.
- **Policy Integration:** Ensuring that considerations of modern slavery risk and prevention are explicitly integrated into Lloyds Wealth's policy review process. By embedding modern slavery prevention into our internal policies and governance reviews, we strengthen our organisational framework against potential human rights abuses.
- **Supplier Engagement and Oversight:** Maintaining robust dialogue and regular reviews with our most critical Tier 1 suppliers during annual business review meetings to raise awareness of modern slavery issues. Through these discussions, we will continue to emphasise our expectations, share best practices, and encourage our key suppliers to uphold and advance anti-slavery standards in their own operations and supply chains.

Closing statement

We are proud to report that no incidents of modern slavery or human trafficking were identified within Lloyds Wealth or our supply chain during 2025. Looking forward, we will continue to uphold the principles of the Modern Slavery Act (2015) with rigour and dedication throughout 2026, ensuring that our business operations and supply chains remain free from exploitation, coercion, and abuse. We remain vigilant and committed to continuous improvement in our practices, partnerships, and policies to eliminate the risks of modern slavery and human trafficking in line with our values and legal obligations.

Approval

This statement was approved by the Board of Directors of Lloyds Wealth on 24 June 2026. The statement will be reviewed and updated annually, in accordance with our obligations under the Modern Slavery Act.

Donald MacKechnie
Managing Director,
Lloyds Wealth

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