EQUINITI GROUP
Modern Slavery Statement 2025

This statement outlines the steps taken in 2025 to ensure that slavery and human trafficking will not take place in either our business or our supply chain.

Our Structure

Orbit Private Holdings I Ltd ("Orbit") is a holding company and affiliate of Siris Capital Group. In December 2021, Orbit acquired Armor Holdco Inc. ("AST"). At the same time, Equiniti Group plc ("Equiniti") was acquired by Earth Private Holdings Ltd, a subsidiary of Orbit. Equiniti and AST were combined to create the Orbit group of companies trading as Equiniti Group ("the Group").

Equiniti (EQ) provides expert shareholder, pension and remediation services to help our customers around the world succeed. With ~5968 employees, it supports ~33 million shareholders, members and customers in 128 countries. EQ's purpose is to care for every customer and simplify every transaction, whilst minimising our impact on the environment. Our vision is to be the leading global share registrar and transfer agent, offering complementary services to our client base.

The Equiniti Group comprises four business divisions: Equiniti (Shareholder Services); Market Engagement, Retirement Solutions and Customer Resolutions; as well as stand-alone credit services business Lenvi.

Introduction

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes the EQ Modern Slavery statement for the financial year ended 31 December 2025.

EQ operates a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business activities and relationships. EQ is also committed 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 by exercising robust due diligence of our partner organisations and suppliers. We expect the same high standards from all of our contractors, suppliers and other business partners.

In 2025, the main activities undertaken to ensure effective management of Modern Slavery risk included:

- Maintaining a Supplier Code of Conduct.
- Maintaining our risk-based policy for EQ's enterprise-wide risk management framework, supported by the ESG Handbook.

We had no reported incidents in 2025.

About Equiniti Group

Equiniti provides expert shareholder, retirement, and remediation services to customers around the world with the vision to become to be the leading global share registrar / transfer agent, offering complementary services to its client base.

We serve clients and customers through four divisions: Equiniti (Shareholder Services), Market Engagement, , Retirement Solutions and Customer Resolutions. Standalone credit services business Lenvi is part of the Equiniti Group.

EQ receives services from its 100% owned Indian subsidiary, Equiniti India Private Limited, based in Chennai and Bangalore.

Following the acquisition of Wells Fargo's shareholder services business in 2018, EQ has significant operations in the US. In 2023, Equiniti and AST merged into a single Equiniti Trust Company, LLC.

In 2025, Equiniti completed the acquisition of Notified, now known as the Market Engagement division. Notified is an award-winning international provider of investor relations (IR) and public relations (PR) communications solutions. It serves over 10,000 clients across 90 countries, including industry leaders like Alibaba, VoItalia, Goldman Sachs, Deloitte and over half of the Fortune 100. Its regulatory filing services operate in 16 markets across Europe.

As a combined organization, we have several smaller office functions or remote workers in The Netherlands, South Africa, Belgium, China, Canada, France, Germany, Sweden, Norway, Italy, Singapore, Lithuania, Israel, the Philippines and Australia.

Find out more about EQ here.

Equiniti (Shareholder Services)

Equiniti delivers trusted data, intelligent insight, and seamless administration across the full equity ownership lifecycle. We help issuers, investors, and employees navigate complexity, strengthen market engagement, and achieve better outcomes through technology-powered solutions backed by expert service. Our 5,000+ global associates support more than 12,000 organizations and over twenty million shareholders worldwide

Market Engagement (Notified) Notified is an award-winning international provider of investor relations (IR) and public relations (PR) communications solutions. It serves over 10,000 clients across 90 countries, including industry leaders like Alibaba, VoItalia, Goldman Sachs, Deloitte and over half of the Fortune 100. Its regulatory filing services operate in 16 markets across Europe.

Retirement Solutions

The Retirement Solutions division provides member and policyholder administration and technology services including pensions and annuity software, business process outsourcing and payments. The business is evolving in the post-COVID world progressing with a plan to improve services through

digitisation and straight through processing, reduce costs within the business and increase productivity.

Customer Resolutions
Customer Resolutions is a specialist division that provides specialist resourcing, consultancy, technology and insight to support regulated business with complex customer challenges. Our clients include 11 of the UK's leading banks and 55 financial services brands. We also support our colleagues across EQ by providing specialist resource, recruitment screening, data migration and complaint technology.

Lenvi
The Lenvi business, (previously known as the Credit, Fraud and Analytics) helps companies to build digital capabilities to combat fraud and automate consumer and commercial lending. It monitors in excess of £37 billion in lending activity and provides fraud solutions to 90% of the receivable finance market in the UK.

Our People

We have 5,968 employees worldwide.

At EQ, we want all colleagues to feel supported, and we have in place a wide range of people policies to protect employees, covering every aspect of the employee lifecycle. This includes resourcing and recruiting, from how candidates are vetted, through to on-boarding and induction. Several policies cover issues such as holiday entitlement, sickness, maternity and paternity arrangements, while a series of other polices relate to the facilities our people make use of at work, such as data, equipment and systems. We also have policies outlining our approach to informal complaints, grievances, whistleblowing and disciplinary matters, as well as redundancy and termination.

We work globally with the Top Employers Institute to benchmark and continuously improve our people practices. In 2025 we were ranked in the top 25% of Top employers in the UK, India and US.

We are a values-led organisation where being collaborative in our approach, trusted to deliver, commercial in our focus and always seeking to improve, guides our everyday. Our values are embedded throughout the organisation from performance management and recognition to engagement and even how we're audited. We believe that living our values will help us achieve our vision to be the leading global share registrar.

Within the UK, EQ is an accredited Real Living Wage employer and pays at least the Real Living Wage (above the UK minimum wage). We comply with the EU Working Time Directive and do not operate zero-hour contracts. Where we utilise temporary workers, we pay above the minimum wage and are compliant with Agency Worker Regulations. EQ has a transparent job level and pay range structure.

EQ is compliant with all employment related legal requirements in the international jurisdictions it operates from and utilises similar or identical people policies to those which apply to colleagues in the UK. Training for required skills and competencies is also provided to all international colleagues.

EQ's US offices meet or exceed all Federal, State and local laws and regulations related to minimum wage, time off, and leaves of absence.

EQ India Private Limited enforces an anti-sexual harassment policy, to protect the safety of all its employees, free of any gender prejudice or sexual harassment (including safety from persons coming into contact at the workplace) and has a zero-tolerance policy towards any instance of sexual harassment. EQ India has a defined pay structure to ensure salaries are competitive and fair in the market.

Our Training

At EQ, we ask all new starters to complete a mandatory Modern Slavery and Human Trafficking eLearning module which forms part of their induction into EQ. This training module is also available to all colleagues on our eLearning Hub so colleagues can refresh their learning at any point in time.

Our Suppliers

While the risk of modern slavery within EQ's direct business operations remains low due to our reliance on a highly skilled, professional workforce, as is the case for many organisations, we recognise our biggest exposure to modern slavery risk is our supply chain.

Our standard supplier agreements contain a contractual obligation requiring compliance with the Modern Slavery Act 2015.

EQ's preferred suppliers provide us with technology, human resources, print and mail services, facilities management, travel and professional services. EQ segments its suppliers by risk to protect our business and our ability to deliver to our customers.

We have analysed our suppliers based on geography, category and spend. Our supplier base is primarily concentrated in the UK (38.5%) and US (29.8%), which together account for 68.3% of suppliers. Continental Europe represents 14.4% of the supplier population, led by Poland, France, Germany and the Netherlands. India accounts for 8.5%, with the remaining 8.8% distributed across APAC and other regions.

Higher risk areas in relation to procurement for professional-service businesses like EQ tend to be in IT hardware and facilities management (for example cleaning and security). EQ will always contract with organisations with strong reputations for ethical and human rights standards to provide these goods and services.

Our Supplier Relationship Management (SRM) framework provides supplier relationship strategies, commensurate with the level of risk and complexity of the relationship, optimising engagement with Critical and High-Risk suppliers. The SRM system supports segmentation and due diligence providing greater visibility and understanding of the risk of potential suppliers and their services. This allows us to undertake the right level of due diligence at onboarding and, where applicable, through the life of the contract.

Due diligence activity is enhanced for higher risk suppliers.

Our Supplier Code of Conduct clearly sets out our expectations of suppliers in relation to environmental responsibility, modern slavery, data protection, human rights and ethics. This is reviewed and, where applicable, updated, annually. This can be found on our web pages and it is sent to all new suppliers as part of our welcome letter. In line with the SRM tool, we ask our High-Risk Tier suppliers to electronically confirm acceptance/ compliance to the code in our due diligence questionnaire.

Where EQ is unable to satisfy itself that a supplier is not aligned to the Act, or our Supplier Code of Conduct, it will firstly work with that supplier to ensure compliance or failing that, terminate the contract.

All Group employees with procurement and outsourcing responsibilities are provided with appropriate training and guidance to ensure that they are able to assess the human rights and labour performance of suppliers.

Our Policies on Slavery and Human Trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

We have a wide range of policies governing Environmental, Social and Governance (ESG) issues, which link to our risk management framework and controls. Our Social & Ethical Business Policy covers modern slavery, human trafficking, and human rights, and outlines key controls which help assess and manage any risks related to modern slavery and human trafficking.

The ESG Handbook supports our ESG related policies, including the Social & Ethical Business Policy. The handbook is available to all colleagues and provides information and guidance on how business areas and risk leaders can ensure compliance with the policies and apply them in practice and helps to build awareness and accountability throughout our business on ethical issues which affect everyone. This is reinforced by our Behaviours and Conduct policy which provides guidance to colleagues on working together with integrity and embedding EQ's values.

Raising concerns safely

In addition to our people policies outlined above, we have a very clear Whistleblowing Policy, supported through detailed guidance to colleagues within the Compliance Handbook which provides the options for colleagues to raise concerns safely. Colleagues have the option to raise this either internally through email/telephone or through the external Safecall service. Safecall allows all EQ colleagues including contractors, temporary workers, as well as suppliers, to raise concerns about serious wrongdoing anonymously. It is available 24 hours a day, 365 days a year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2025. It was approved by the board on 4th November 2026.

Adam Mesh, Chief People Officer

Equiniti Group Limited
Date: 09/11/2026