

EQUINITI GROUP

Modern Slavery Statement 2023

This statement outlines the steps taken in 2023 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 ~6000 employees, it supports ~40 million shareholders, members and customers in 136 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: UK Shareholder Services; US Shareholder Services; 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 2023.

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 2023, the main activities undertaken to ensure effective management of Modern Slavery risk included:

- Introducing a Supplier Code of Conduct.
- Integrating our new risk-based policy into EQ's enterprise-wide risk management framework, supported by a new Responsible Business Handbook.

We had no reported incidents in 2023.

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: UK Shareholder Services, US Shareholder Services, 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.

We also have several smaller office functions or remote workers in The Netherlands, Poland, South Africa and Belgium.

Find out more about EQ [here](#).

UK Shareholder Services

UK Shareholder Services offers a broad range of services, including managing share registers, Annual General Meetings ("AGMs"), corporate actions, employee share plans, custody and dealing services and advisory solutions. A market leader in the UK, it holds over 10 million shareholder records, sends £31 billion in payments each year, and looks after 1.2 million share plan participants.

US Shareholder Services

The US Shareholder Services division (also known as EQ US) was created by combining the legacy Equiniti EQ US division and legacy AST business to create one US Shareholder Services division.

EQ US are specialists in helping clients better understand and manage the ownership of their company through critical events across the corporate lifecycle. As trusted advisors, EQ US provide strategic insight and operations expertise through core business units in Private Company Services, Transfer Agent Services, Employee Plan Solutions, Proxy Services, and Bankruptcy.

EQ US are an industry-leading provider of ownership data management, analytics and advisory services to public companies, private companies and mutual funds. EQ US is the number two transfer agent in the US in terms of market share, and the number one IPO administrator. The EQ US division also includes the leading proxy advisory firm D.F. King & Co. Inc. It provides services to over 4000 clients, including working with 35% of the S&P 500, with over 19 million shareholders, delivered by 1,200 employees.

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.

Since 2012 Retirement Solutions have held a stake in MyCSP Limited (“MyCSP”). MyCSP administers the Principal Civil Service Pension Scheme and provides pensions to over 1.5 million people. MyCSP is a unique brand: a mutual joint venture partnership between Employee Partners who own 25% of the company, and Equiniti, who own 75%.

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 10 of the UK’s leading banks and 36 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 6,000 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 policies 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. In 2023, we invested significant time and resource to update all of our people policies, fronted by a Global employee handbook, to improve user experience, bolster employee engagement and promote our values globally.

Underpinning all of our people policies is a strong culture of diversity and inclusion, and we have global and local diversity and inclusion councils in operation to ensure fair and equal treatment of employees, supported by policy and strong colleague engagement.

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 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.

MyCSP reserves one seat on its Board for a Director nominated by the employees. The nominated Director is actively involved in all levels of company governance and a member of all key decision-making bodies within MyCSP.

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. 56% of our direct suppliers are based in the UK, 24% in the US, 10% in Europe, and the remaining 10% are based across the rest of the world.

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 Responsible Business 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 2023. It was approved by the board on 3rd June 2024.

Andrew Stephenson, Chief People Officer



Equiniti Group Limited

Date: 03/06/24