

## Modern Slavery Statement – Financial Year 2023

The Modern Slavery Act 2015 (“the Act”) requires that any commercial organisation in any sector, which supplies goods or services, and carries on a business or part of a business in the UK and is above a specified total turnover (£36 million), must produce a slavery and human trafficking statement for each financial year of the organisation.

This statement is made in accordance with Section 54 of the Act for OakNorth Bank plc for the financial year ended on 31 December 2023.

### 1. OakNorth Bank plc’s structure, business and supply chains

OakNorth Bank plc (“OakNorth Bank” or “OakNorth”) is a regulated bank incorporated in England. It provides online retail and business savings accounts, business current accounts and offers business loans to growing and small medium size enterprises in the United Kingdom. OakNorth Bank plc is authorised by the Prudential Regulatory Authority (PRA) and regulated by the Financial Conduct Authority (FCA). More details about the bank’s structure and activities can be found in our annual report.

OakNorth Bank sources products and services from suppliers globally and requires that its suppliers do not use any form of modern slavery or human trafficking. It is important to note that OakNorth Bank does not manufacture goods or handle raw materials or commodities. As a provider of online financial services in the UK, OakNorth Bank plc’s supply chain consists of mainly online IT-enabled, enterprise and software service suppliers, as well as suppliers of office-related goods and services in the UK. The Bank’s main supplier is its sister company OakNorth Global Private Ltd in India.

### 2. Our Policies in relation to slavery and human trafficking

We have a Code of Conduct for employees, which sets out our commitment to ensuring that we all act and are treated ethically, fairly and with respect and dignity. We recognise that our employees’ continuing success as individuals, colleagues and a company, depends on all of us treating each other with respect and upholding the highest professional and ethical standards.

All our employees are required to attest to the Code of Conduct on an annual basis.

In addition, all our employees are required to undertake mandatory online training every year about i) the Act and ii) Whistleblowing.

We ask our suppliers to provide their statement or policies relating to slavery and human trafficking and check that they comply with or are equivalent to the requirements of the Act. We have a dedicated Supplier Relationship Management team which oversees a rigorous supplier risk management process which includes engaging with its suppliers to seek assurance about their anti-slavery and human trafficking policies and whether they are taking steps to prevent slavery and human trafficking in their respective business and supply chains. Every supplier is onboarded under the governance provided by our Outsourcing Policy and Supplier Management Policy with OakNorth’s Material suppliers approved by Senior Management and Board in addition key suppliers are approved by a senior member of management or the Operations Committee.

Our whistleblowing policy allows anyone who has a concern to raise it anonymously and safely. We take whistleblowing very seriously and investigate any concerns raised and, where relevant, take appropriate action.

### **3. Due Diligence processes in relation to human trafficking in our business and supply chains**

Our suppliers go through a rigorous risk assessment exercise and due diligence process which addresses the controls in place to ensure that slavery and human trafficking do not take place. We conduct regular performance reviews of our supplier relationships to address any material changes within the supply chain. Our dedicated Supplier Relationship Management team ensure each supplier undergoes a thorough due diligence assessment prior to onboarding and undergoes a regular review to ensure compliance with our standards. Each supplier is assigned a risk score and Tier to determine the appropriate level of governance and oversight required, each Tier as standard includes a modern slavery and human trafficking assessment. The risk assessment format is reviewed annually to ensure it remains relevant with current risk trends. Ongoing adverse media and PEPs and Sanction checks are completed via monitoring tool to provide real time alerts to potential threats.

### **4. Parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to assess and manage that risk**

We believe that the risk of slavery and human trafficking across the supply chain is low. We ask our UK suppliers to provide their own statement in compliance with the Act, and we check that our foreign suppliers have similar policies in place. OakNorth Global Private Ltd, our main supplier based in India, where the risk of slavery and human trafficking is inherently higher than in the UK, applies the same rigorous on-boarding and due diligence process as the Bank. OakNorth Bank maintains an active directory of all suppliers including categorisation of goods and services there suppliers provide.

### **5. Effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains**

We have not identified any supplier that fails to meet our expectations with regards to their policies on slavery and human trafficking.

### **6. Training and capacity building about slavery and human trafficking available to staff**

All staff at OakNorth Bank plc and OakNorth Global Private Ltd must undertake mandatory training about i) the Modern Slavery Act upon joining, and complete ii) whistleblowing training annually.

### **7. Our plans for 2024**

In 2024, we will remain committed to tackling Modern Slavery where we can and as such will continue to develop our ESG activities and due diligence framework for suppliers to ensure OakNorth can identify risks in the Supply Chain for Modern Slavery and Human Trafficking. Additionally, OakNorth Bank will enhance training for colleagues across the business with annual refresher training. Our Code of Conduct supports our zero tolerance policy to Modern Slavery and we will continue to review this on an ongoing basis. All staff at OakNorth Bank plc and OakNorth Global Private Ltd will continue to undergo mandatory training on i) the Act and ii) Whistleblowing.

### **8. Approval**

This statement was approved by our Board on 24th June 2024 and was signed by our Chief Executive Officer, Rishi Khosla, on 17 May 2024.

A handwritten signature in black ink, appearing to read 'Rishi Khosla'.

**Rishi Khosla, CEO**