

Sainsbury's Bank

Modern Slavery and Human Trafficking Statement 2025-2026

Sainsbury's Bank PLC ("the Bank")

Modern Slavery and Human Trafficking Statement 2025-2026

Introduction

At Sainsbury's Bank, we have always been committed to championing human rights. It is extremely important to us that the people involved in our business – whether through our operations or in our supply chains – aren't being exploited and have their human rights respected. We recognise the hidden nature of modern slavery risks, and we are committed to respecting human rights and identifying vulnerable workers and we will not tolerate any form of slavery or servitude in our business or supply chains.

As a business, we stand against all forms of modern slavery and the exploitation of people for personal or commercial gain. Modern slavery and human trafficking are abhorrent practices that still exist in many parts of the world, including the UK. We take our commitment and duty to tackle these critically important issues seriously.

This Bank statement details our efforts to prevent modern slavery in line with Section 54 of the UK Modern Slavery Act 2015. It

details the steps taken by the Bank during the year ending 28 February 2026 to prevent modern slavery and human trafficking in our business operations and supply chains. It was written in collaboration with Sainsbury's Supermarkets, recognising our broader Group strategy on human rights.

This statement has been approved by the Bank's Board of Directors.

Modern Slavery and Human Trafficking Statement 2025-2026

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 28 February 2026.



Michael Larkin
Chief Finance Officer
For and on behalf of Sainsbury's Bank plc
Date: 26 March 2026

Sainsbury's Bank

Sainsbury's Bank plc, Registered Office: 33 Charterhouse Street, London EC1M 6HA (Registered in England and Wales, no. 3279730). Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (Register no. 184514). Sainsbury's Supermarkets Ltd is an appointed representative of Sainsbury's Bank plc.

About Sainsbury's Bank

Sainsbury's Bank is a retail bank which is wholly owned by J Sainsbury's plc. Its registered office is in London, with a head office in Edinburgh and it is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. The Bank's total income for the financial year ended 28th February 2026 was £424m.

Sainsbury's was founded, in 1869, on the principle of care and always doing what is right and fair for our colleagues, our customers and the communities we serve and source from. Our strong sense of social, environmental and economic responsibility has been at the heart of what Sainsbury's does and we continue to apply these principles as we prepare for and deliver our strategic transformation programme.

Across the Group, we take an integrated approach to addressing modern slavery risks in our business operations and supply chains, whilst recognising the unique brand profiles across our Group-wide sustainability plan: Plan for Better. Plan for Better incorporates our social and environmental commitments.

Since Sainsbury's decision to withdraw from its core banking business in January 2024, good progress has been made to complete transformation activities and exit from key business lines. This has further reduced our already low risks of modern slavery within our own UK-based, financial services organisation, but we may be indirectly exposed to modern slavery risks through our supply chain as a predominantly outsourced operation.

In line with the Bank's reducing risk profile, our supply chain has reduced from 170 active suppliers to around 50. These range from large banks and IT service corporations to small and medium sized enterprises that provide various marketing and operations services. We continue to work as collaboratively as possible with our suppliers and build relationships with them over time so that we are aware of what is happening in their business and how it can affect ours. Most of our supplier relationships have been long term and are located within the UK or operate through UK-based business units.

Policies and Governance

Our Human Rights Policy is applicable across the Sainsbury's Group. This Policy outlines our commitment in line with the International Bill of Human Rights, UN Guiding Principles on Business and Human Rights and ILO Declaration on Fundamental Principles and Rights at Work. We communicate our zero-tolerance approach to any form of human rights abuses and requirement for suppliers to provide information on their actions to demonstrate compliance with the UK Modern Slavery Act 2015 where necessary.

Our Whistleblowing Policy aims to encourage a culture that makes it easy for colleagues to raise concerns internally or externally in relation to poor business or unethical practice or behaviour via a variety of methods including 'Call it Out' (Sainsbury's independently run 'whistleblowing' reporting

system) in a confidential and independent manner. We have safeguards in place to protect the anonymity of whistle-blowers. These policies are reviewed regularly, with assurance and monitoring undertaken monthly to ensure they remain relevant and encompass good practice.

The Chief Risk Officer (CRO) is the Senior Manager responsible under the Senior Management and Certification Regime for managing ESG matters including human rights and modern slavery, with key risks assessed and brought to the attention of Executive and Board Risk Committees through monthly CRO reporting.

Addressing modern slavery in our supply chain

Our processes, policies and controls are centred around the people at the heart of our business and doing our utmost to respect and uphold their human rights. They reflect our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective frameworks and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of risk identification and mitigation approach, we have in place processes and frameworks to:

- Identify and assess potential modern slavery or human trafficking risk areas for any new suppliers.
- Reduce the risk of slavery and human trafficking occurring in our current supply chain.

We have a zero-tolerance approach to modern slavery and human trafficking. To ensure that all those in our supply chain operate in accordance with our values we have a rigorous supplier management programme consisting of:

- Competitive yet ethical sourcing.
- Standard contractual terms that include a clause on compliance with the Modern Slavery Act 2015, with appropriate action being taken should any supplier be found in breach of this clause.
- Due diligence processes (outlined below) that verify suppliers' compliance with the Modern Slavery Act.
- Accountable decision making.
- A risk-based supply chain assurance programme that includes a review of Modern Slavery statements for applicable suppliers.
- Capability training (including modern slavery-specific training) for those responsible for the sourcing, assurance and management of suppliers, completed by all of the Supply Chain Management team.

Addressing modern slavery in our supply chain

Whenever a new supplier is required for Bank, due diligence is carried out to ensure that that supplier can not only provide the right product or service at a competitive price but that its actions do not conflict with the values of the Sainsbury's Group. An extensive questionnaire is completed by each new contracting party either at tender or onboarding stage to ensure that our business values align. We complete an initial check on whether all applicable suppliers have prepared and published a Modern Slavery statement and, where they are not required to do so by law, whether they have done so by choice. As part of our risk-based approach to ongoing assurance we check that selected suppliers have maintained their Modern Slavery statement and continue to answer our assurance questions relating to our overall Environmental, Social and Governance goals.

We regularly review our due diligence processes to identify vulnerable or at-risk workers.

In order to complement and enhance our understanding of high-risk supply chains, the Bank use a financial services-specific tool to gain more in-depth data on our suppliers' activities: Hellios. This provides standardised data on suppliers across a community of similar organisations, in our case financial organisations, in order to help them meet their regulatory and governance requirements.

Where suppliers have been identified as members of the Hellios community we use the Hellios portal to allow the Bank to monitor risks more actively on human rights and modern slavery within their operations. Where suppliers are not members of the Hellios community we consider human rights/modern slavery risk as part of our overall risk-based approach to supplier assurance.

Financial Crime

Modern slavery is of course not just an issue to be considered in relation to the management of our supply chain. We remain vigilant for it in our dealings with customers too.

Within our internal Financial Crime processes, there are extensive “know your customer” (KYC) checks carried out before a customer is brought on board. These checks allow us to verify (i) who the customer is and (ii) how they are likely to transact once the relationship begins. The close links between modern slavery and money laundering mean that our KYC checks aid our defence against both. Deep understanding of the customer is crucial, particularly given the attempts made by criminals to conceal as much information about themselves as possible. Periodic refreshes of the information we hold about our customers and their activities help to ensure that we have the most up-to-date details on record.

Our Financial Crime team monitor the activity of existing customers for situations that appear suspicious. Instances of suspicious activity are highlighted and investigated using established detection scenarios. These detection scenarios are designed to capture known financial crime behaviours and also

activity that is deemed to be inconsistent with the customer’s profile gathered at the KYC stage.

The Financial Crime team also use similar techniques to identify possible instances of modern slavery that require further investigation (for example designed around factors such as numerous applications being submitted from the same address or postcode). The colleagues entrusted to work alerts are trained in the detection of “red flags” for both normal financial crime and modern slavery situations.

Checking for modern slavery risks is also an additional step our internal investigators take when investigating cases that have originally been brought to our attention for reasons other than potential slavery.

We ensure that we raise suspicious activity reports to the National Crime Agency through our nominated office function. Annual training is provided to colleagues on how to raise a SAR when they see something that they deem suspicious. Annual training is also provided on modern slavery and the red flags associated with it.

Recruitment and Employment

We have robust and proportionate recruitment processes and procedures in place to mitigate against modern slavery risks, including eligibility checks to work legally in the UK.

All colleagues working at the Bank are employed by either Argos Ltd, Sainsbury's Supermarkets Limited or Sainsbury's Bank plc. In advance of any candidates being offered employment, we carry out compliance checks, including a financial health check. All colleagues undergo Right To Work checks in accordance with HMRC guidelines, the Immigration Act 2016 and our Right To Work Policy. The Right to Work Policy includes not only checking that people can legally work for us but also that anyone joining

us, whether in a temporary or permanent role, are doing so of their own volition. Each team in the Bank also has wellbeing volunteers who are there to help support anyone who reaches out for help.

Of the 476 colleagues employed by Sainsbury's Bank (as at 18th February 2026), 456 are permanent or fixed-term employees and 20 on temporary contracts. When sourcing for temporary staff, we only source from reputable recruitment agencies, and, recognising the risk of uncertainty of work and income they bring, we don't make use of zero hours contracts.



Training our Colleagues

We recognise that in order for us to address modern slavery and human trafficking risks, we must ensure that our colleagues understand what modern slavery is, what the indicators are, and how to report concerns. We aim to raise awareness throughout our business and with our supply chain, so that responsibility for identification of issues is shared, rather than sitting with a smaller group of experts, or being reliant on external stakeholders.

Since we started delivering training on modern slavery across the Bank in 2016, we have seen consistently high completion rates. The training has been mandatory for all new colleagues within Bank.

Completion rates of mandatory training are reviewed quarterly and any decrease below 95% is reported to the Executive Board Risk Committee. As of 28th February 2026, 96% of colleagues are up to date with their modern slavery learning requirements.

The modern slavery training continues to receive favourable feedback with an average rating of 4.6 out 5 stars, with colleagues commenting that it provides them clear direction on what they should do if they suspect modern slavery as well as how to spot the signs of it occurring.

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Key Performance Indicators

Percentage of Sainsbury's Banks colleagues up to date on their modern slavery mandatory learning training:

96%

Number of reported incidents received either internally or through 'Call it Out' of suspected trafficking, modern slavery or forced labour:

0

We continue to review our KPIs to ensure they accurately assess the effectiveness of our actions.

Future Approach

Over the last year, Sainsbury's Bank has undergone significant change and we anticipate that from 1st July 2026, Sainsbury's Bank will no longer hold its banking license and will instead operate solely as a Sainsbury's Group function, distributing financial services products which are manufactured by our Partners.

Going forward future reporting from 2026/27 will be incorporated into future Sainsbury's Group Modern Slavery and Human Trafficking statements.