

2025 Modern Slavery and Human Trafficking Statement

Alfa Financial Software Limited (“the Company”), a wholly owned subsidiary of Alfa Financial Software Holdings PLC¹ (“Alfa”), is committed to continually improving its practices to combat slavery, forced labour, human trafficking and child labour in all its operations and supply chains. Alfa has zero tolerance for modern slavery in any form and is committed to acting ethically and with integrity in all business relationships.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and is intended to meet the reporting requirements of the Australian Modern Slavery Act 2018 (Cth).

The statement sets out the steps taken during the financial year ending 31 December 2025 to identify, assess and address modern slavery risks in Alfa’s operations and supply chains

What is Modern Slavery?

The term modern slavery is a broad one. It considers someone to be in modern slavery if they are in forced labour, servitude, slavery, human trafficking, debt bondage, forced or servile marriage, descent-based slavery or child exploitation. It is a global and growing issue. No sector or industry is exempt from the potential for modern slavery. The Company has a responsibility to understand the risks in its business and supply chain and to manage them accordingly.

Alfa does not permit or tolerate forced labour or modern slavery and expects our suppliers to strictly prohibit its use. This statement outlines how we are preventing modern slavery in our business operations and supply chains.

Our business, structure and operations

Alfa is a global provider of software and implementation services for the asset finance and leasing industry. The Group operates primarily as a software development and delivery business, with professional services supporting customer implementations. Alfa’s operations are predominantly office-based, employing skilled professional and technical staff and do not involve manufacturing or the production of physical goods.

¹ This statement describes the activities being undertaken by Alfa Financial Software Holdings PLC and its subsidiaries worldwide, including all subsidiaries incorporated in Australia, Germany, New Zealand, the United Kingdom and the United States, to prevent slavery and human trafficking in our business operations and supply chain.

Alfa operates in multiple jurisdictions, including the United Kingdom, Australia, Europe, North America and Asia-Pacific, with governance and strategic oversight provided at Group level by the Board of Alfa Financial Software Holdings PLC.

Our Supply Chains

As a software and delivery company, the Company does not use an extensive range of local or international suppliers where modern slavery or human trafficking would generally be a material risk. Alfa's supply chains primarily comprise:

- Technology infrastructure and cloud service providers;
- Professional and advisory services;
- Recruitment and staffing services;
- Office services, facilities management and utilities; and
- Travel, accommodation and related corporate services.

Given the nature of Alfa's business, the Board considers the inherent risk of modern slavery within Alfa's direct operations and first-tier suppliers to be comparatively low. However, Alfa recognises that modern slavery, forced labour and child labour risks may arise in any sector or geography, particularly within extended and indirect supply chains, and therefore maintains proportionate controls and oversight.

Our policies and governance

Alfa's approach to preventing modern slavery is underpinned by a number of Group-wide policies and governance arrangements, including:

- **Ethics and Code of Conduct Policy**, which details the policies in relation to ethics, anti-corruption and bribery.
- **Our staff handbook**, which aims to foster a workplace environment that is fair, open and respectful, and one that promotes and protects the rights and dignity of all employees.
- **Whistleblowing Policy** encourages employees to speak up and report any potential signs of wrongdoing or concerns about illegal activity.
- **Harassment Policy** to ensure our employees have a safe place of work, free from any form of bullying or harassment.
- **Equity, Diversity, and Inclusion Policy**, ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated.

- **Recruitment processes** provide equality and fairness for all those who apply to us for employment and all those in our employment, and not to discriminate in any circumstance.

The Board of Directors retains overall responsibility for overseeing Alfa's approach to ethical conduct, human rights and modern slavery risk, supported by senior management and internal reporting processes

Effectiveness and monitoring

The Company understands its responsibility to continue assessing and mitigating the risk of modern slavery in its supply chain in the long term. While the Company continues to make progress in this area, future developments will be to update understanding and reassess the nature of that risk, assessing whether policies and controls are appropriate and to ensure that controls to manage any risk are operating effectively if that risk arises. It is expected that the nature of the risk may change over time and ongoing vigilance will be required.

During the year ended 31 December 2025, Alfa was not aware of any confirmed incidents of modern slavery or human trafficking within its operations or supply chains, and no such matters were reported through its whistleblowing channels.

Training and awareness

Alfa recognises the importance of awareness in preventing modern slavery. Employees are supported through policies, guidance and internal communications designed to promote ethical behaviour. Modern slavery awareness is included within broader compliance and ethics training materials.

Alfa's Ethics and Code of Conduct Policy sets out the standards and principles that guide our behaviour as a company. The Policy is designed to reflect our corporate purpose and values and to serve as a benchmark for ethical conduct across all aspects of our business.

All Alfa colleagues are required to demonstrate their understanding and commitment to the Code of Conduct. This is achieved through a formal declaration, conducted during both the new-joiner onboarding process and the annual compliance review. Each colleague must declare that they have read, understood and are in compliance with the Policy by completing an annual certification declaration.

Due diligence processes

Alfa has in place a Supplier Code of Conduct and Procurement Policy to address, among other things, issues of child labour, compulsory labour and human trafficking. All new suppliers with anticipated spend exceeding £25,000 (or local currency equivalent) are required to confirm that they have in place or adhere to modern slavery legislation. All new suppliers, subject to an annual spend threshold, must go through the Alfa Supplier onboarding process and are required to sign up to the Alfa Supplier Code of Conduct or confirm they have equivalent policies in place, providing reassurance that they understand the importance we place on these issues right from the start of our relationship with them.

Alfa requires suppliers to complete a Supplier on-boarding questionnaire as part of its due diligence procedures in relation to existing and potential suppliers. The results of each questionnaire are reviewed and securely stored upon return. As part of our ongoing review, Alfa periodically assesses its existing supplier base. During the financial year ended 31 December 2025, Alfa reviewed 28 existing suppliers with annual spend in excess of £100,000 (or local currency equivalent), focusing on the nature of the services provided and to provide reassurance that our suppliers are aligned with Alfa's ethical and compliance expectations.

To assess the effectiveness of controls to ensure modern slavery does not exist within any of the business activities, the Company aims to, in 2026:

- Continue to review the effectiveness of the Supplier Code of Conduct and Supplier On-Boarding process;
- Continue to strengthen due diligence processes in relation to our supplier relationships;
- Continue to ensure awareness of the signs of modern slavery and human trafficking and the reporting mechanisms if a case of slavery or human trafficking is suspected; and
- Monitor government and other perspectives and approaches to modern slavery and actively consider their applicability to the Company.

Alfa remains committed to continually strengthening its approach to modern slavery in line with evolving best practice and regulatory guidance in Australia and the UK. This includes reviewing disclosures, enhancing due diligence where appropriate, and ensuring that modern slavery considerations remain integrated into Alfa's wider ESG and risk management frameworks.

Consultation

In preparing this statement, Alfa Financial Software Holdings PLC has consulted with its wholly owned subsidiaries and relevant internal stakeholders to ensure that the statement accurately reflects Alfa's operations, risks and practices across the Group, in line with the consultation requirements of the Australian Modern Slavery Act 2018 (Cth).

Alfa is not aware of any slavery or human trafficking in any part of our operations or supply chain, and no issues were raised during the year ended 31 December 2025.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth) and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 December 2025.

The statement was approved by the Board of Alfa Financial Software Holdings PLC on 5 March 2026.

A handwritten signature in black ink, consisting of a series of loops and a trailing line, representing the signature of Andrew Denton.

Signed by **Andrew Denton, Chief Executive Officer**

Date: 5 March 2026