

Barclays PLC
Group Statement
on Modern Slavery

February 2026



Introduction

Our success is measured not only by our commercial performance, but also by our contribution to society and the way we work together for a better financial future for all our stakeholders.

We believe we can make a positive difference for society - globally and locally. We do that through the choices we make about how we run our business, in light of relevant risks, the legal frameworks in the markets we operate, and other factors, and through the commitments we make to support our clients and communities and champion sustainability for the long term. We are at our best when our clients, customers, communities and colleagues all progress. By doing so, we aim to contribute to a more sustainable, inclusive, and resilient financial system in the long term.

Modern slavery encompasses a range of serious human rights abuses, including trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services. It represents one of the most severe and pervasive forms of human rights impacts globally. According to estimates from the International Labour Organisation¹ and Global Business Network on Forced Labour, around 28 million people are in forced labour and 17.3 million of them are working in the private economy, excluding sexual exploitation, and 3.3 million are children.

In this Statement² we report the progress made over the course of the year and outline our plans for the year ahead.

Further information on our broader approach to managing environmental and social risks can be found in our Annual Report 2025.

 [Link to Barclays PLC Annual Report 2025
home.barclays/annualreport](https://home.barclays/annualreport)

Notes:

- 1 International Labour Organization (ILO), available at [fbusiness.network/](https://www.ilo.org/)
- 2 This is a joint statement made according to the requirements of section 54 of the UK Modern Slavery Act 2015 and section 14 of the Australian Modern Slavery Act 2018 (Cth), for the financial year ending 31 December 2025. This is our tenth UK Statement and sixth Australian Statement. It applies to all companies within the Barclays Group that are required to produce a statement as listed in the Appendix. In this Statement, a reference to 'Barclays', 'Group', 'we' and 'our' includes Barclays Capital Asia Limited, Barclays Bank PLC and its owned or controlled entities under the Australian Modern Slavery Act 2018 (Cth). Barclays Capital Asia Limited does not own or control any other entities.

As of 2024, global estimates of modern slavery from the International Labour Organization and Global Business Network on Forced Labour, highlight that:

c. 28 million
people are in forced labour

17.3 million
of them are working in the private economy, excluding sexual exploitation

3.3 million
are children¹



Our business and supply chain

Working together for a better financial future

We deploy our resources...

We draw on tangible and intangible assets to drive long-term, sustainable value creation. We invest and maintain our resources to ensure we can continue to provide maximum value to our customers and clients.

Our people, Purpose, Values and Mindset

Our people are our organisation. We deliver success through a Purpose-driven culture.

Our brand

Our brand equity instils trust, lowers the cost of acquiring customers and clients, and helps retain them for longer.

Technology and infrastructure

Our AI-enabled technology and infrastructure capabilities enhance customer experience and support strong resilience.

Operations and governance

Our risk management, governance and controls help ensure customer and client outcomes are delivered in the right way.

...to serve a broad range of customer and client needs...

We provide a comprehensive offering through UK consumer, corporate and wealth and private banking franchises, a leading investment bank and a specialist US consumer bank.

Lending

We lend to customers and clients to support their needs.

Protecting

We ensure the assets of our clients and customers are safe.

Investing and advising

We help our customers and clients invest.

Moving

We facilitate transactions and move money around the world.

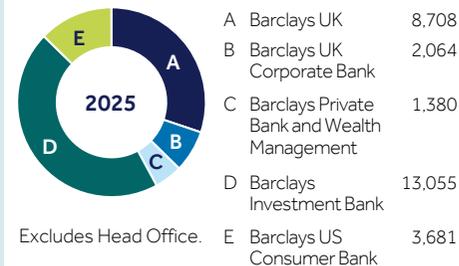
Connecting

We connect companies seeking funding.

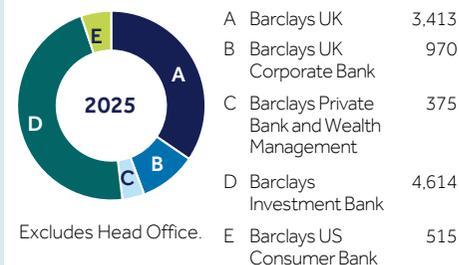
...deliver sustainably higher returns...

We seek growth and stability of income, delivering cost efficiencies, prudent risk management, and efficient allocation of our resources.

Total income by business (€m)



Profit before tax (PBT) by business (€m)



...and provide positive outcomes for our stakeholders.

Our diversified model positively impacts our stakeholders and provides the resilience and consistency needed to deliver value for them.

Customers and clients

Supporting our customers and clients to achieve their goals with our products and services.

Colleagues

Providing employment to c.93,000 colleagues globally and helping them develop as professionals.

Society

Providing support to our communities, and access to social and environmental financing to address societal needs.

Investors

Delivering attractive and sustainable shareholder returns on the foundation of a strong balance sheet.

Our business and supply chain (continued)

Our Company structure

Barclays Group operates through five divisions: Barclays UK, Barclays UK Corporate Bank, Barclays Private Banking and Wealth Management, Barclays Investment Bank, and Barclays US Consumer Bank.

Barclays UK broadly represents businesses that sit within the UK ring-fenced bank entity, Barclays Bank UK PLC, comprising of Personal Banking, Business Banking and Barclaycard Consumer UK.

The remaining divisions are operated within our non-ring-fenced bank (Barclays Bank PLC³), and its subsidiaries, and certain other entities within the Group.

All divisions are supported by Head Office, which provides centralised services across the Group.

Barclays adopts a Group-wide approach to addressing modern slavery risks in its operations and value chain, including the adoption of the relevant Group-level policies and due diligence procedures described on pages 5-9. There are several subsidiary companies of Barclays PLC that meet the threshold of 'reporting entities' required to have a modern slavery statement under the UK Modern Slavery Act 2015 and/or the Australian Modern Slavery Act 2018 (Cth) (Australian Act), which are listed in the Appendix. This Statement is a joint statement made by Barclays PLC on behalf of those reporting entities.

We report on Barclays Bank PLC Australia Branch and our Asia Pacific subsidiary Barclays Capital Asia Ltd in compliance with the Australian Act. Barclays' Group Sustainability team consulted with the local management of Barclays Bank PLC Australia Branch and Barclays Capital Asia Ltd in the preparation of this Statement, as well as colleagues across the Group who are responsible for the activities described in this Statement. This includes those carried out by Barclays Bank PLC and its owned or controlled entities. The entities that Barclays Bank PLC owns or controls are listed in the Barclays Bank PLC Annual Report 2025⁴. Barclays Capital Asia Ltd does not own or control any other entities, and so the requirement in section 16(1)(f)(i) of the Australian Act does not apply to that reporting entity.

Barclays Bank PLC Australia Branch currently engages in limited wholesale activities in Australia with its foreign company registration and licensing exemption granted by the Australian Securities and Investments Commission (ASIC), and with authorisation from the Australian Prudential Regulation Authority as a foreign bank.

The Investment Bank of Barclays Bank PLC generally only deals with wholesale-based, corporate clients in the Asia Pacific region (including Australia), mainly providing corporate and investment banking services, markets and research products. Third-Party Service Providers (TPSPs) are managed in line with the Global Third-Party Service Provider Policy and associated standards, supported by other policies and standards where applicable. Barclays Bank PLC Australia Branch offers corporate clients AUD deposits and lending products, among other things.

Barclays Capital Asia Ltd is incorporated in Hong Kong and provides various financial services including securities advisory and trading services under its licence by the Securities and Futures Commission of Hong Kong. It also engages in limited wholesale activities in Australia with its foreign company registration and licensing exemption granted by ASIC.

Barclays Capital Asia Ltd only deals with wholesale-based, corporate clients in both Hong Kong and Australia. TPSPs are managed in line with the Global Third-Party Service Provider Policy and associated standards, supported by other policies and standards where applicable.

Notes:

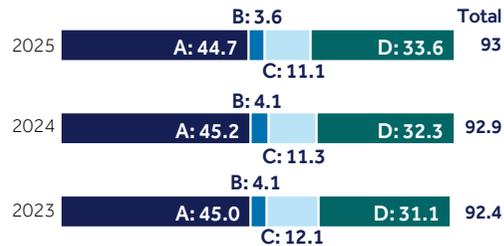
- 3 Barclays Bank PLC has a physical presence in the following countries: Australia, Canada, Cayman Islands, Chile, China, Colombia, France, Germany, Guernsey, India, Ireland, Isle of Man, Israel, Italy, Japan, Jersey, Monaco, Qatar, Singapore, South Africa, Switzerland, Turkey, United Arab Emirates, UK and US. Barclays Execution Services Limited has a physical presence in the following countries: Czech Republic, Ireland, Singapore and UK.
- 4 Barclays Bank PLC Annual Report 2025, available at: home.barclays/investor-relations/reports-and-events/annual-reports/

Our business and supply chain (continued)

Our people

As of 31 December 2025, we have c.93,000 Barclays employees operating primarily in the UK, the Americas and the Asia Pacific region.

Number of employees split by region (000s)



A UK B CEME⁵ C Americas D APAC

Of the 33,600 staff employed in the Asia Pacific Region, around 1,818 are employed by Barclays Bank PLC (excluding managed services staff employed by other Group-related entities), of which around 520 are permanent staff employed by Barclays Capital Asia Ltd in Hong Kong and 23 are employed by Barclays Bank PLC Australia branch.

Paying at least the living wage in all our locations is at the heart of our Fair Pay Agenda. We annually review pay levels for all colleagues globally against local living wage benchmarks, and where necessary make increases to ensure that we continue to at least meet these benchmarks.

In the UK, our minimum rate of pay is £13.74⁶, already ahead of the 2026 Real Living Wage set by the Living Wage Foundation. This will increase further, subject to agreement of the 2026 pay deal with Unite⁷. In the US and India, we are increasing minimum pay levels from 1 March 2026, from \$22.50 to \$23.50 in the US and from INR 158.00 to INR 163.00 in India.

→ For further details, please see the Remuneration report in the Barclays PLC Annual Report 2025 found at: home.barclays/annualreport

Our supply chain

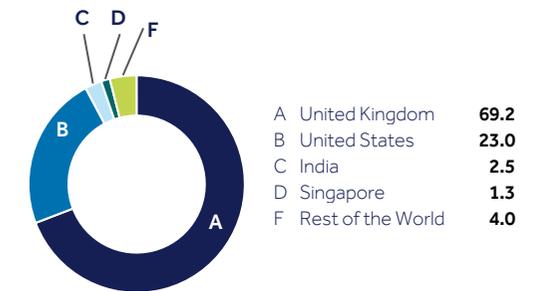
Though our businesses are geographically diverse, more than 90% of our third-party spend is concentrated in the UK and the US.

Our supply base is diverse in scale and structure – from privately held start-ups to publicly listed multinational corporations.

Those we contract with directly, also known as 'tier 1' TPSPs, often fall into one or more of the following categories by most significant spend: Technology Infrastructure, Software & Services, Professional Services, Corporate Real Estate and related services, Banking Operations, Marketing, and Human Resources. As many of our tier 1 TPSPs have their own extensive supply chains, we ultimately connect to thousands more businesses and workers worldwide.

TPSPs are managed in line with the Global Third-Party Service Provider Policy and associated standards, supported by other policies and standards where applicable.

Chart 1: TPSP spend per country (%)⁸



Notes:

- Central Europe and Middle East.
- London-based employees are already paid at least the Living Wage Foundation's London Living Wage.
- Tesco Bank and KMC employees are paid above the Living Wage Foundation rates, but different UK minimum hourly pay rates are currently applicable to them, and they are not covered by the pay deal with Unite.
- This chart represents the countries in which the goods and services are invoiced. Our TPSP spend per country has changed in comparison to prior year, as spend has reduced in Germany following Barclays' sale of its consumer finance business in Germany on 3 February 2025.

Identifying, assessing and addressing modern slavery risks

Our policies relating to modern slavery

Barclays is committed to respecting human rights as defined in the International Bill of Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work. Our approach to respecting human rights is guided by the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines). The actions outlined in this Statement are supported by an evolving framework of policies and processes that seek to embed our commitment to respect human rights, including our approach to modern slavery, across our business:

- Our Group Statement on Human Rights, which sets out Barclays' commitment and approach to respecting human rights in our roles as an employer, a provider of financial products and services, and a procurer of goods and services.

➔ For further details, please see: home.barclays/content/dam/home-barclays/documents/citizenship/our-reporting-and-policy-positions/Barclays-Group-Statement-on-Human-Rights-February-2024.pdf

- Our Code of Conduct – The Barclays Way – which outlines the Purpose, Values and Mindset governing our way of working across our business, and sits alongside our employment policies and practices. While not identified expressly as human rights policies, these policies are an important part of our efforts to meet our responsibilities to respect human rights, including workers' rights. This includes, in the context of modern slavery, policies and controls to ensure colleagues are paid appropriately above the living wage identified in their jurisdiction.

Our Group-wide policies also cover important topics such as overtime payments, holiday entitlements and rights of association, all of which are supported by wider policies and benefits available to colleagues. These policies assist to address risks to workers' rights in our operations.

➔ For further details, please see: home.barclays/content/dam/home-barclays/documents/citizenship/the-way-we-do-business/The_Barclays_Way.pdf

- Our Code of Conduct (CoC) for Third Party Service Providers (TPSPs), encourages our TPSPs to adopt our approach to doing business inline with the Barclays Values and details our expectations for matters including human rights and modern slavery-related topics.

➔ For further details, please see: home.barclays/who-we-are/our-suppliers/our-requirements-of-external-suppliers/

- Our Financial Crime Compliance Statement covers our approach to anti-bribery and corruption, anti-money laundering, anti-tax evasion facilitation and sanctions. This is relevant because modern slavery offences are often linked to money laundering and other financial crimes.

➔ For further details, please see: home.barclays/our-sustainability-/sustainability-resource-hub/statements-and-policy-positions/

We endeavour to monitor emerging human rights-related laws, rules and regulations, as well as international normative standards, good practice and stakeholder expectations, and we seek to review our policies and practices accordingly.

Raising concerns

Barclays is committed to fostering a culture where everyone feels empowered to speak up if they believe something is not right. According to our latest colleague engagement survey, a substantial majority of our colleagues feel safe doing so. Most colleagues feel comfortable raising concerns directly with their management, Compliance, Legal, or HR. However, if they prefer, colleagues can also contact the Barclays Raising Concerns Team.

The Raising Concerns Team is responsible for receiving, assessing, and referring concerns, including those related to potential modern slavery and whistleblowing, to the appropriate team for review and possible investigation. All matters raised through this process are handled with seriousness, sensitivity, and confidentiality. Information on how to raise a concern is accessible both internally and externally.

Whistleblowing is an important aspect of this process, covering concerns that affect the broader public interest, such as breaches of our policies and procedures, breaches of law and regulation, and actions that could damage Barclays' reputation or financial wellbeing. We take all whistleblowing reports very seriously and maintain a zero-tolerance policy against any form of retaliation toward whistleblowers or individuals providing information during an investigation.

During 2025:

- No substantiated incidents related to modern slavery concerns were raised through our Raising Concerns reporting channels.

Governance

Barclays PLC Board

The Barclays PLC Board receives regular updates on public policy and corporate responsibility matters, including sustainability and reputation risk, which may cover human rights matters.

The Board is presented with the Group Reputation Risk Report from the Group Head of Public Policy and Corporate Responsibility (PPCR) twice a year in order to consider the most significant live and emerging reputation risks for the Group, as well as a summary of any key items discussed by the Group Reputation Risk Committee. Both of these updates may cover human rights matters. In addition, the Board may be notified of, or be asked to consider, specific reputation risk matters from across the Group, aligned with the escalation protocols set out in the Reputation Risk Management Framework.

Board Sustainability Committee

The Board is supported by the Board Sustainability Committee (BSC), which provides oversight of climate matters and the Group's sustainability agenda, including human rights matters (for example, modern slavery), escalating items to the Board as appropriate.

Group Sustainability Committee

The Group Sustainability Committee (GSC) is a sub-committee of the Group Executive Committee (ExCo) and is chaired by the Group Head of PPCR. GSC members include senior sustainability representatives from across the businesses, including the Group Head of Sustainable and Transition Finance, as well as members representing key functions across the Group. The GSC is responsible for approving and recommending sustainability matters on behalf of ExCo to the BSC as appropriate.

At an operational level, internal stakeholders met as part of a modern slavery working group to assess areas for enhancement and prioritise actions to try to mitigate modern slavery risks.

Identifying, assessing and addressing modern slavery risks (continued)

Our supply chain

Our 2024 supply chain human rights saliency assessment identified modern slavery as one of the potential salient human rights impacts in our supply chain⁹. These findings continued to inform our approach to managing modern slavery risk in 2025. Our Sustainability Operations team, working in collaboration with TPSP Accountable Executives and stakeholders across Barclays, is responsible for overseeing the steps we take to try to identify, assess and manage the risk of modern slavery and other adverse human rights impacts within our supply chain.

Section 1: Risk assessments

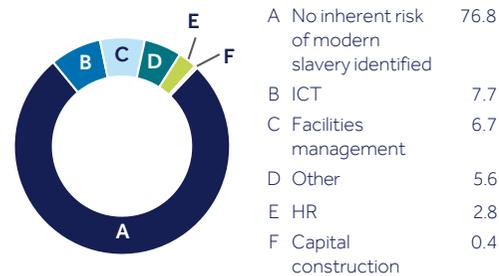
Assessment of modern slavery risk

We assess the modern slavery risk of Barclays' TPSPs annually, using information from the Global Slavery Index¹⁰, to evaluate the likelihood that our TPSPs have supplied goods and services using forced labour or child labour. This assessment highlights where the risk of modern slavery may be present in supply chains, rather than indicating the presence of actual cases.

We have identified the following categories of goods and services as carrying an inherent risk of modern slavery (Chart 2):

- Facilities management services at our properties, including cleaning, catering, and corporate security.
- Information and communications technology (ICT) goods and services, including hardware manufacturing, connectivity, and telecoms infrastructure.
- Human Resources (HR) services, such as venues for recruitment events and external training providers.
- Construction of our properties and related construction services (capital construction).
- Other categories including but not limited to contingent workers and corporate wear.

Chart 2: Percentage of TPSPs per spend category identified as carrying an inherent risk of modern slavery¹¹



It remains challenging to identify the inherent risk of modern slavery beyond tier 1 of our supply chain. To strengthen our approach, in 2025, we started to integrate human rights and modern slavery risk-related questions into our procurement sourcing workflow¹², informed by our 2024 supply chain human rights saliency assessment. Through this process, TPSPs who provide goods and services in the categories above are asked to confirm:

- if they have been investigated under modern slavery or human rights legislation; and
- if they are sourcing goods and services from high-risk countries or using vulnerable worker groups¹³, which may include:
 - unskilled, low-skilled and low-paid workers;
 - seasonal, temporary or agency workers;
 - workers who paid recruitment fees;
 - migrant or displaced people.

We use this information to determine whether due diligence is required as set out in Section 3.

Section 2: Management of modern slavery and adverse human rights risk

Barclays expects its TPSPs to comply with applicable laws, rules and regulations within the geographies in which they operate.

We aim to embed modern slavery and broader human rights considerations into our procurement processes through:

- TPSP CoC: all new TPSPs, regardless of business risk, are asked to complete a self-certification against the TPSP CoC as part of the onboarding process, and managed¹⁴ TPSPs are asked to self-certify annually thereafter. The TPSP CoC sets our expectations on:
 - freely chosen employment
 - avoidance of child labour
 - avoidance of discrimination, harassment and abuse
 - worker freedom of association and collective bargaining
 - workplace arrangements, working conditions and third-party employment agencies
 - wages and benefits
 - occupational health and safety
 - grievances and whistleblowing.
- In 2025 we updated our TPSP CoC to incorporate findings from the 2024 supply chain human rights saliency assessment, setting expectations on the privacy of workers.
- General contract terms, which can be subject to negotiation, contain obligations on TPSPs to respect human rights, and to implement reasonable due diligence procedures to help identify, prevent, minimise and/or mitigate modern slavery and human trafficking in the TPSPs' operations or supply chain delivering products or services to Barclays.

We also ask TPSPs providing services on premises that Barclays operates in the UK to confirm that they pay the Real Living Wage, in line with our commitment as a Living Wage employer.

Payment on time

Prompt payment is critical to the cash flow of every business, and especially to smaller businesses within the supply chain, as cash flow issues are a major contributor to business failure. Prompt payment of TPSPs is also an important means of mitigating exposure of workers to exploitation through late payment of wages. Further information on prompt payment of TPSPs is available in Barclays PLC Annual Report 2025, page 209.

Notes:

- ⁹ Refer to page 249 of Barclays PLC Annual Report 2024 to find out more about our supply chain human rights saliency assessment.
- ¹⁰ The Global Slavery Index is a report on modern slavery published by Walk Free group. It presents a detailed picture of modern slavery across industries and countries, and indicates the actions governments are taking to address modern slavery.
- ¹¹ The categories shown in Chart 1 have changed from the prior year, as the corporate wear and contingent workers categories have now been incorporated into the 'Other' category. Spend categories in the 'Other' category individually make up less than 0.4% of all our TPSPs.
- ¹² The procurement sourcing workflow process applies to a defined sub-set of TPSPs. Certain engagements are managed through alternative processes depending on the nature of the arrangement.
- ¹³ 'Vulnerable worker groups' has been determined using guidance from the ILO Forced Labour Indicators 2025 revised edition at ilo.org and the Global Slavery Index 2023 report.
- ¹⁴ TPSPs assessed as being above a low risk of exposure from a business risk perspective - both at the point of onboarding and on an ongoing basis - become 'managed' TPSPs and are subject to ongoing management and controls assurance during the term of service.

Identifying, assessing and addressing modern slavery risks (continued)

Section 3: Ongoing TPSP due diligence and engagement

In 2025 we continued to engage with selected TPSPs to communicate our TPSP CoC expectations for matters including modern slavery.

Additionally, we continued to use Sedex¹⁵ to strengthen our due diligence process. We continued to ask TPSPs identified for due diligence to register with Sedex and complete a self-assessment questionnaire (SAQ), to allow us to gain insights into their business practices, policies and working conditions. The SAQ questions are framed on the ETI Base Code methodology¹⁶. Additionally, we have access to the SMETA¹⁷ reports for TPSPs registered with Sedex, which we plan to use, along with the SAQs, to understand how TPSPs respond to findings raised. For example, we have SMETA audits for manufacturing facilities supplying our corporate wear TPSPs, helping us better understand the working conditions at these facilities.

Modern slavery risks in TPSPs' supply chains

Modern slavery risks are more likely to be found beyond tier 1 of a supply chain¹⁸. Therefore, in 2025 we continued developing our understanding of where inherent risks may exist across the supply chains of both existing and prospective TPSPs. Our work focused on selected TPSPs operating in categories identified as having an inherent risk of modern slavery (as detailed in Section 1 on page 6).

For example, we engaged with our TPSP in the capital construction category for the refurbishment project at our UK headquarters¹⁹. Following our engagement, the TPSP implemented several anti-slavery measures at the site, including displaying the modern slavery helpline number of Unseen²⁰, delivering a modern slavery awareness session supported by a Barclays' subject matter expert, and introducing a speak-up mechanism for their contractors.

During 2025:

- We delivered training and ongoing engagement with selected Barclays' TPSP Accountable Executives and Procurement colleagues to grow awareness of modern slavery risks.
- We continued to work with Sedex to try to strengthen our TPSP due diligence process on human rights, including modern slavery.

During 2026 we aim to:

- Continue to enhance our understanding of TPSPs with an inherent risk of modern slavery, for example through TPSPs' worker voice insights.

Notes:

¹⁵ Sedex (Supplier Ethical Data Exchange) is a global technology company that specialises in data, insights and professional services to empower supply chain sustainability. Their platform, tools and services enable businesses to easily manage supplier sustainability risks and improve on their social, environmental and ethical performance. Further information is available at sedex.com

¹⁶ The Ethical Trading Initiative (ETI) Base Code is founded on the ILO Conventions, and includes assessment of all key labour exploitation and child labour indicators, such as freely chosen employment and no harsh or inhumane treatment of workers. Further information is available at ethicaltrade.org/eti-base-code

¹⁷ SMETA (Sedex Members Ethical Trading Audit) methodology assesses the audited site against the ETI Base Code, the standards of the ILO Conventions and local law. The ILO Conventions set out basic principles and rights at work.

¹⁸ The Global Slavery Index 2023 report. More information is available on page 4 of the report: <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>

¹⁹ 1 Churchill Place, Canary Wharf, London, E14 5HP, UK.

²⁰ Unseen is a UK charity which provides support for survivors of trafficking and modern slavery, and works with individuals, communities, businesses, governments, other charities and statutory agencies to prevent modern slavery.

Identifying, assessing and addressing modern slavery risks (continued)

Retail customers

Barclays aims to prevent the misuse of its products and services to facilitate modern slavery. We recognise the risks associated with modern slavery, and we actively seek opportunities to strengthen our capabilities to prevent, detect, and disrupt such activities. Our actions are supported by ongoing collaboration with industry peers and public sector partners.

This includes an escalation process that enables any colleague to report their modern slavery concerns for investigation and allows engagement with law enforcement agencies when appropriate. In 2025, Barclays reported 1,029 cases to law enforcement after identifying indicators of modern slavery.

During 2025 we:

- Enhanced detection capabilities aimed at improving identification of modern slavery. This model leverages data insights and intelligence from the Joint Money Laundering Intelligence Taskforce (JMLIT) public private partnership (PPP).
- Developed a new intelligence approach to identify financial crime threats (including modern slavery) via data analysis and reviewing available intelligence. This resulted in the identification and escalation of multiple customer safeguarding cases to law enforcement.
- Supported law enforcement requests in modern slavery investigations.
- Delivered training to Barclays colleagues to improve awareness of modern slavery threats and mark Anti-Slavery Day.

During 2026 we aim to:

- Continue to play a role in advancing collective awareness and response to modern slavery threats through co-chairing a new National Crime Agency (NCA) cell.
- Continue to develop technology-driven and analytics-led approaches detecting and preventing modern slavery.

Tesco Bank

Following Barclays Bank UK PLC's acquisition of Tesco Bank in November 2024, analysis was undertaken to assess and confirm equivalence of policies and standards, including those which seek to identify and address modern slavery risks covering Financial Crime, Procurement, Supplier Management, and People policies. While operational processes continued to run separately during 2025, the approach to management of modern slavery risk remained substantively equivalent between Barclays Group and the Tesco Bank business. In 2025, Tesco Bank made progress towards integrating with the broader Barclays Group across core controls that manage modern slavery risk, including third-party and colleague due diligence. Integration of relevant controls will continue in 2026. As a result, some enhancement activities carried out by Barclays Group, described in this Statement, have not yet been extended to the Tesco Bank business.

Identifying, assessing and addressing modern slavery risks (continued)

Investment Bank and UK Corporate Bank

The management of social risks associated with Investment Bank and UK Corporate Bank clients, including human rights and modern slavery risks, is governed under Reputation Risk Principal Risk within the Barclays Enterprise Risk Management Framework (ERMF) – which apply to all Barclays' Investment Bank and UK Corporate Bank client relationships, including those managed via Barclays Capital Asia Ltd and Barclays Bank PLC Australia Branch.

We have established position statements²¹ covering our relationships with Investment Bank and UK Corporate Bank clients in certain sensitive sectors that have the potential to cause significant adverse impacts on people, including in connection with modern slavery, or the environment. These position statements detail our expectations for in-scope clients including commitments relating to the robust management of environmental and social risks, including for modern slavery risks.

For example, in our Forestry and Agricultural Commodities Statement we state that Barclays has no appetite for providing Financial Services²² to soy, beef, palm oil, forestry and timber companies that are directly involved in acts of violence against or exploitation of people and local communities, including through forced or child labour, modern slavery and human trafficking – widely recognised as salient risks in certain countries.

Our position statements are periodically reviewed and updates considered in light of the rapidly changing external environment, including, for example, public policy, laws and regulation, technological advancement, geopolitical or regional developments.

For more detailed information on how these policy statements are operationalised please see the Barclays PLC Annual Report 2025 and the Statements and Policy Positions section of the Barclays website, available [here](#).

We continue to monitor issues and developments globally that may present new or elevated human rights risks. We then work to evaluate our potential involvement and consider our responsibilities to seek to address these risks.

During 2025 we:

- Continued to evolve how we assess social risks as part of the Sustainability Enhanced Due Diligence (SEDD) process, by strengthening screening of human rights and modern slavery considerations across clients in-scope of the position statements.
- We delivered human rights training to teams across the Group, led by Group Sustainability. These trainings were provided to support colleagues' understanding of human rights risks, including modern slavery where relevant.

During 2026 we aim to:

- Continue to strengthen colleagues' understanding of modern slavery, through integration into training, where relevant.

Client SEDD process relating to human rights and modern slavery risks

Clients in-scope of our position statements are subject to a detailed SEDD questionnaire. This looks at regulatory censure and stakeholder criticism to identify any potential issues in respect of acts of violence against, or exploitation of, people and local communities, including through forced or child labour, modern slavery and human trafficking.

This review generates an outcome based on alignment with position statements and identified environmental and social issues. The review outcome determines whether further review by the Environmental and Social Risk Management (ESRM) team within Group Sustainability is required. Client engagement may be undertaken as part of the periodic review cycle (annual or biennial).

Where this has been triggered, we have sought to engage with clients and understand policies and/or processes in place aimed at ensuring forced labour is not present in operations and supply chains. In addition, we may apply certain conditions which are determined on a case-by-case basis and could include, prior to further transactions, ongoing monitoring/performance data, implementation of appropriate policies and due diligence processes, and further monitoring of adverse media.

Notes:

²¹ Position statements cover Climate Change, Defence and Security, Forestry and Agricultural Commodities, Protected Areas (previously World Heritage Sites and Ramsar Wetlands), and are available [here](#).

²² 'Financial Services' in our Forestry and Agricultural Commodities Statement refers to all lending, underwriting, arranging and distributing of debt and equity, trade and working capital finance, derivatives and FX transactions.

Identifying, assessing and addressing modern slavery risks (continued)

Investments

Private Bank and Barclays Investment Solutions Limited (BISL)^{23,24} provide clients with access to sustainable investing solutions across asset classes and investment approaches, within discretionary portfolio management (DPM) and managed funds. These are available alongside traditional investment products and allow clients to align investments with their financial objectives and where relevant, sustainability preferences.

We support clients in meeting financial and, where applicable non-financial objectives. We believe responsible investing helps us achieve this. Further details on Private Bank's approach to responsible investing^{25,26} can be found here and for BISL here.

Where relevant to the investment strategy and asset class, as part of the investment process, we assess, among other things, an issuer's/ company's management of environmental, social and governance-related risks and opportunities, helping to identify risks and opportunities that are financially material and may affect long-term returns.

As part of integrating such considerations into our investment due diligence within DPM²⁷, we aim to consider material human rights risks of portfolio companies such as modern slavery, human trafficking and forced labour, workplace standards and employee relations.

We use the International Bill of Human Rights, the UN Global Compact Principles (UNGC Principles), the UNGPs and OECD Guidelines as guiding frameworks to flag any non-alignment with human rights standards and other related controversies against the entity, as identified by our third-party data provider.

Our DPM team considers a number of social metrics related to the workforce, social issues and controversies. These can include considerations such as employee turnover, worker welfare and labour standards, disputes relating to employment practices (including allegations of labour exploitation or potential modern slavery concerns) and other human rights issues. This helps us better identify controversial business practices and assess the quality of the management team.

Stewardship through engagement and voting is an important part of our approach to responsible investing. Both the Private Bank and BISL undertake this activity in partnership with our stewardship provider, EOS at Federated Hermes Limited (EOS), which engages with companies on our behalf where they identify controversies and selected material ESG issues or opportunities to strengthen risk management practices^{25,28}.

EOS's engagement with corporates may take place at board and senior executive level, covering a range of topics such as human rights and labour rights, including modern slavery. Aligned to the UN Sustainable Development Goals, EOS seeks progress on various financially material social issues linked to companies' operations, products and supply chain. EOS also engages with companies to seek to improve human capital management with the aim to achieve a healthy, skilled and productive workforce inclusive of wider society, with access to equitable pay and benefits, in the context of rapid technological disruption.



Further details on our Responsible Investing and Stewardship approach, including human and labour rights can be found at:

- Private Bank: privatebank.barclays.com/what-we-offer/investments/responsible-investing-engagement-and-voting-activities/
- BISL: barclays.co.uk/wealth-management/important-information/responsible-investing-statement

Engagement with a multinational technology company - digital rights and social considerations

EOS has been engaging with a multinational technology company on human rights issues linked to new and emerging digital products, including the metaverse. The engagement objective is for the company to complete a standalone human rights impact assessment (HRIA) aligned with the UNGPs. Since 2022, EOS has held multiple engagements with the company. Progress includes the publication of a human rights report in 2023, completion of an AI HRIA in 2024, and development of a responsible AI assessment template.

The company was positively recognised by Global Network Initiative (GNI) members for being the only company to directly participate in negotiations of the proposed UN Convention on Cyber Crimes, and to voice its opposition to the convention due to human rights concerns.

In 2025, EOS continued engagement on digital rights and broader societal impacts, including discussions at the company's headquarters on technology governance, AI, and cloud responsibilities, and encouraging greater transparency through case studies and broader industry collaboration. The company has also shared its latest AI report with EOS to support ongoing assessment of human rights and labour-related considerations.

While meaningful progress has been made, EOS will continue its engagement on digital rights and human rights topics.

To encourage the company in its work on the topic, at the 2025 AGM, we supported shareholder proposals seeking greater transparency and strengthened due diligence on human rights and AI, particularly in light of evolving regulatory frameworks such as the EU AI Act and CSDDD.

Source: EOS, Barclays Private Bank and BISL

Notes:

- 23 Private Bank and Wealth Management (PBWM) is one of Barclays' five operating divisions (created during the 2024 Group restructuring). It brings together the Private Bank and the Wealth Management businesses under a single division. The Private Bank is a client-facing business line within PBWM, providing investment offerings. BISL is a wholly owned UK investment firm, operating within PBWM which serves as the investment manager responsible for delivering DPM and fund-of-fund solutions used across PBWM investment offerings.
- 24 Private Bank operates across multiple jurisdictions, including Ireland, the UK, the Channel Islands, Switzerland, India, South Africa, Dubai International Financial Centre, Monaco and Singapore. BISL manages investments for Barclays Asset Management Limited (BAML is an Authorised Fund Manager) for its UK domiciled funds and is delegated investment manager for external management companies for selected Luxembourg and Irish domiciled funds. BISL is responsible for making all day-to-day investment

decisions on behalf of each fund range wherever it is domiciled.

25 Please refer to the respective Private Bank (privatebank.barclays.com/what-we-offer/investments/responsible-investing-engagement-and-voting-activities/) and BISL Responsible Investing (barclays.co.uk/wealth-management/important-information/responsible-investing-statement) websites for more details.

26 Applies to Barclays Private Bank DPM and BISL DPM and BISL Funds. Responsible Investing activities are not undertaken in India: where strategies are developed for the local market.

27 Please note responsible investing approach may differ for investments into sovereign, supranational and agency bonds and labelled bonds issued by corporates.

28 Please note our stewardship approach (guided by our stewardship provider EOS) may differ across different regions. Any voting is undertaken in line with applicable laws and rules, including on antitrust, conflicts of interest and acting in concert.

Engagement and training on modern slavery (continued)

External engagement

In recognition of the multifaceted challenges posed by modern slavery, Barclays considers that a partnership approach, such as through PPPs, is the most effective means of understanding and trying to address the associated risks. Throughout 2025, Barclays took an active and leadership role in a range of PPP initiatives, collaborating with a broad spectrum of stakeholders, including government agencies, law enforcement, non-governmental organisations, financial institutions, and other private sector entities. Through these engagements, Barclays contributed financial crime advice and co-ordinated strategies to strengthen collective efforts in detecting, disrupting, and preventing modern slavery.

As one of the seven UK banks involved in the NCA's National Economic Crime Centre (NECC) Data Fusion PPP pilot, we are proud to support the NCA's operations targeting threats such as organised immigration crime, modern slavery, money laundering, and fraud. This initiative, launched in July 2024, brings together law enforcement, bank investigators, and data scientists to jointly analyse account and transaction data alongside intelligence. By sharing targeted financial data with multiple indicators of criminality, we help uncover criminal networks linked to money laundering, identify red flags, and generate actionable intelligence. Since going live in May 2024, the project has delivered over 90 intelligence packages²⁹, enabling more focused investigations and enhancing our collective ability to protect the public and financial sector from criminal exploitation.

During 2025 we:

- In relation to financial crime with respect to retail customers:
 - Supported intelligence initiatives led by PPPs (e.g. the NECC Data Fusion Pilot and JMLIT). Through these collaborations, we endeavoured to strengthen our collective ability to detect, respond to, and prevent modern slavery. These efforts reinforce Barclays' commitment to innovative solutions and industry partnership.
 - Supported law enforcement requests to support modern slavery investigations.
- In relation to our supply chain:
 - Presented on Barclays' approach to modern slavery at the live launch of the CCLA Modern Slavery UK Benchmark 2025³⁰. Engaging with the CCLA Benchmark helps us to identify opportunities for further enhancements.
 - Participated in the UK Home Office Forced Labour Forum, contributing to updated guidance supporting section 54 of the Modern Slavery Act 2015.
 - Attended cross-industry events and conferences to stay informed of emerging best practices, such as the Unseen Business Awards ceremony, and the Thun Group of Banks on Human Rights³¹.
 - Joined the Slave-Free Alliance (SFA)³² to gain insights on approaches to identifying, assessing and managing modern slavery risks. We also participated in the Finance Sector Working Group chaired by the SFA.

During 2026 we aim to:

- In relation to financial crime with respect to retail customers: continue to support key PPPs initiatives that help to enhance shared industry awareness, detection capabilities and co-ordinated responses to modern slavery.
- In relation to supply chain: work with the SFA to gather insights to support our ongoing embedment of modern slavery considerations into our processes.

Notes:

²⁹ National Crime Agency: nationalcrimeagency.gov.uk/news/ground-breaking-public-private-partnership-launched-to-identify-criminality-using-banking-data

³⁰ CCLA (Churches, Charities and Local Authorities) Modern Slavery Benchmark assesses the top 100 non-UK-listed companies by market capitalisation on their response to modern slavery.

³¹ Thun Group of Banks on Human Rights is an informal group of banks that collaborates to understand how human rights can be respected and promoted across various banking activities.

³² Slave-Free Alliance is an international social enterprise, wholly owned by global anti-slavery charity Hope for Justice. They support organisations in working towards slave-free operations and supply chains.

Engagement and training on modern slavery (continued)

Training and awareness raising

All colleagues are required to complete annual training on financial crime, which references to human rights, including human trafficking risks. Training content is updated with the latest threat intelligence from both internal and external sources, and it feeds directly into our guidance materials, such as red flags and typology indicators, ensuring colleagues are equipped with current insights to support them to fulfil their responsibilities.

In addition, those working in Procurement, Events and Hospitality, and Corporate Real Estate Services across all regions must undertake a specialised eLearning course on modern slavery each year. This training focuses on the UK and Australian Modern Slavery Acts and outlines practical steps for identifying and reducing risks of human trafficking and exploitation within our supply chains. While this module is mandatory for certain teams, it is also available to the wider workforce on a voluntary basis.

During 2025 we:

- In relation to financial crime with respect to retail customers:
 - Provided training to our BUK Retail and Business Banking colleagues on modern slavery typologies and organised immigration crime to equip them with the skills to recognise key indicators and report concerns. This was delivered via a series of presentations.
 - Continued to develop our internal modern slavery reference library to provide guidance to our colleagues on the evolving threat. This centralised online library is open to all colleagues and serves as a platform for the latest insights, including typologies, red flags, and indicators relevant to modern slavery across Barclays. We seek to regularly update it to give teams access to current and actionable intelligence.
- In relation to supply chain:
 - Delivered a tailored training session for Barclays' Accountable Executives who manage TPSPs in categories carrying an inherent risk of modern slavery, in collaboration with the Slave-Free Alliance, and our facilities management TPSP. The session marked the UK and Europe's 2025 Anti-Slavery Week and focused on recognising modern slavery indicators across supply chains.
 - Delivered training sessions for internal Procurement teams about the embedment of modern slavery risks into the procurement sourcing workflow, reaching over 200 colleagues.

During 2026 we aim to:

- In relation to financial crime with respect to retail customers: continue to use our role in PPPs to understand new trends and typologies, cascading to internal colleagues where appropriate to continue to develop understanding of modern slavery risk.

Assessing the effectiveness of our actions

Modern slavery is a hidden risk – and evaluating our approach and progress is complex. We currently track the following selection of metrics in order to better understand the effectiveness of our approach, and seek to evolve and enhance our monitoring approach over time. Updates on how we are progressing are provided throughout this Statement.

Metrics

Topic	Key performance indicator	2025	2024
Colleagues	• Percentage of assigned colleagues in Sourcing, Corporate Real Estate Services and Events and Hospitality functions completing modern slavery training ³³	99%	99%
	• Number of substantiated incidents related to modern slavery concerns raised through our Raising Concerns reporting channels	0	0
Third-Party Service Providers	• Percentage of managed TPSPs (by addressable spend ³⁴) that had a modern slavery policy or standard in place ³⁵	74%	75%
Corporate clients	• Number of client relationships and transactions subject to sustainability enhanced due diligence review ³⁶	770	775
	• Number of client relationships and transactions reviewed in connection with modern slavery risks by Group Sustainability	14	15

Notes:

33 Metric based on the percentage of assigned Sourcing, Corporate Real Estate Services and Events and Hospitality colleagues completing the 2025 Modern Slavery Training Module before 1 January 2026. Data derived from Barclays Learning Platform.

34 Addressable spend is a subset of external costs incurred by Barclays in the normal course of business where Procurement has oversight over spend. It excludes costs such as regulatory fines or charges, exchange fees, taxation, employee expenses or litigation costs and property rent.

35 We had an ambition for our TPSPs making up 70% of our addressable spend to have a modern slavery policy or standard in place by 2025. We measure our performance by verifying the percentage of managed TPSPs (by addressable spend) that have self-certified to having: (i) a standalone Modern Slavery Policy and related Standards or; (ii) hold the Modern Slavery BS 25700:2022 Standard or; (iii) insert Modern Slavery considerations into relevant policies, e.g. Human Resources, Hiring of Workers, Supply Chain. The 2025 key performance indicator is based on supply chain data extracted on 14 January 2026. In 2026, we aim to review our approach to modern slavery-related supply chain metrics.

36 The number of reviews reported this year is reflective of total number of transactions and relationships subject to sustainability enhanced due diligence process, as opposed to only reviews undertaken by the Environmental and Social Risk Management team within Group Sustainability. For further detail, please refer to page 205 of the Barclays PLC Annual Report 2025.

Mapping of requirements

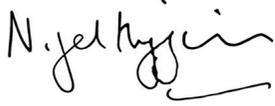
Australian Modern Slavery Act 2018 (Cth) - mandatory reporting criteria

This Barclays Group Statement on Modern Slavery 2025 has been prepared to comply with the mandatory reporting criteria outlined in the Australian Modern Slavery Act 2018 (Cth), and the table below indicates where each criterion is addressed within this Statement.

Modern Slavery Act 2018 (Cth)	Barclays Group Statement on Modern Slavery section title	Page Number
16(1)(a) Identify the reporting entity	Our Company structure	Page 03
16(1)(b) Describe the structure, operations and supply chain of the reporting entity	Our Company structure	Page 03
	Our people	Page 04
	Our supply chain	Page 06
16(1)(c) Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Our people	Page 04
	Our supply chain	Page 06
	Retail customers	Page 08
	Investment Bank and UK Corporate Bank	Page 09
16(1)(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Investments	Page 10
	Our people	Page 04
	Our supply chain	Page 06
	Retail customers	Page 08
	Investment Bank and UK Corporate Bank	Page 09
16(1)(e) Describe how the reporting entity assess the effectiveness of such actions	Investments	Page 10
	Engagement and training on modern slavery	Page 11-12
16(1)(f)(i) and (ii) Describe the process of consultation with any entities that the reporting entity owns or controls	Assessing the effectiveness of our actions	Page 13
	Our Company structure	Page 03

Statement review

The Statement has been approved by the Board of Barclays PLC on 09 February 2026 and has been signed on its behalf by the Barclays Group Chairman and Chief Executive.



Nigel Higgins
Group Chairman
Barclays PLC



C. S. Venkatakrisnan
Group Chief Executive
Barclays PLC

Appendix: Scope of Statement

This Statement covers Barclays PLC and the following subsidiary companies³⁷ of Barclays PLC required to have a statement under the UK Modern Slavery Act 2015:

- **Barclays Bank PLC**
- **Barclays Execution Services Limited**
- **Barclays Bank UK PLC**
- **Clydesdale Financial Services Limited**
- **Barclays Investment Solutions Limited**
- **Barclays Capital Securities Limited**

This Statement covers the following subsidiary companies³⁷ of Barclays PLC required to have a statement under the Australian Modern Slavery Act 2018 (Cth):

- **Barclays Capital Asia Ltd**
- **Barclays Bank PLC**

Notes:

³⁷ The subsidiary companies of Barclays PLC required to have a statement under the UK Modern Slavery Act 2015 and/or the Australian Modern Slavery Act 2018 (Cth) are listed in the Appendix to the Statement. Each of these entities' respective Boards have approved the Statement. Copies of the Statement signed on behalf of each entity, the date on which each entity's respective Board approved the Statement and the name of their respective signing Director (or equivalent) are available on request from Barclays Corporate Secretariat, 1 Churchill Place, London E14 5HP, UK. Kensington Mortgage Company Limited is a wholly owned indirect subsidiary of Barclays PLC and is required to have a statement under the UK Modern Slavery Act 2015. It produces a separate Slavery and Human Trafficking Statement, available at: kensingtonmortgages.co.uk/compliance/modern-slavery



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