

Raylo Group Limited **Modern Slavery Statement**

For the Financial Year Ending 30 September 2025

1. Introduction

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and sets out the steps Raylo Group Limited ("Raylo") has taken to ensure that there is no slavery or human trafficking in any part of our business or supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced and compulsory labour, and human trafficking. Raylo has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships.

2. Our Structure, Business, and Supply Chains

Raylo is a fintech company headquartered in London. Our primary business is the origination and servicing of hire agreements by consumers and businesses for the use of electronic devices. Our mission is to accelerate the transition to a circular economy and our technology platform enables the lease-and-reuse of devices, which makes them more sustainable, accessible and affordable.

Our supply chains include Original Equipment Manufacturers (OEMs), logistics providers, software partners, and professional services firms.

Raylo is committed to conducting business with reputable suppliers who share our values and dedication to ethical practices, and adherence to local and international human rights laws.

3. Policies in Relation to Modern Slavery

Raylo's recruitment and employment policies ensure fair, transparent hiring processes and full compliance with UK labour laws, and reflect our commitment to ethical business practices and compliance with modern slavery legislation.

Responsibility for the implementation and oversight of Raylo's modern slavery controls rests with the Chief Risk Officer, supported by the Risk & Compliance Team.

4. Due Diligence Processes

We assess the risk of modern slavery through our supplier due diligence procedures applied to our supply chain and partners. These processes include:

- Risk-based assessments of suppliers based on industry, geography, and service type;
- Requiring supplier acknowledgment of and compliance with modern slavery laws;
- Performing onboarding and periodic reviews of suppliers to ensure ongoing compliance.

5. Risk Assessment and Management

Raylo recognises that certain areas of the supply chain may pose greater risk, particularly where Raylo's suppliers have reliance on manufacture, labour, third-party subcontracting, or sourcing from international suppliers. We take a proactive approach to mitigating these risks by:

- Risk assessing suppliers through our due diligence process;

- Proactively reviewing OEM Modern Slavery statements;
- Mapping key supply chain relationships;
- Escalating material or high-risk findings to the Chief Risk Officer.

Concerns relating to suspected modern slavery can be raised confidentially through Raylo's Whistleblowing Policy, which is accessible to employees and certain third parties.

6. Remediation Framework

Where a concern or confirmed instance of modern slavery is identified, whether through due diligence, audit, whistleblowing or otherwise, Raylo is committed to a remediation approach aligned with the UN Guiding Principles on Business and Human Rights. Our approach includes:

- Prompt investigation of the concern by the Risk & Compliance Team, escalated to the Chief Risk Officer and, where material, the Board;
- Engagement with the affected supplier to require a time-bound corrective action plan;
- Prioritising the safety, wellbeing and access to remedy of any victims identified, including referral to appropriate support services;
- Verifying that corrective actions have been implemented before continuing the supplier relationship; and
- Suspending or terminating the supplier relationship where remediation is not achieved or the breach is sufficiently serious.

Wherever possible, our remediation approach prioritises the interests of victims over the continuation of a commercial relationship.

7. Training and Awareness

Raylo is committed to ensuring that all employees have the knowledge and tools to identify and respond to modern slavery risks. All employees receive training on recognising the indicators of modern slavery, forced labour and human trafficking, and understand the steps to take should concerns arise.

Training is reviewed periodically to ensure it remains relevant and reflects current risks. All employees are made aware of Raylo's Whistleblowing Policy, which provides a confidential channel for reporting concerns relating to modern slavery or labour exploitation.

8. Effectiveness and Performance Indicators

To measure the effectiveness of our efforts, we monitor:

- Supplier compliance through onboarding due diligence;
- Whistleblowing reports or complaints related to labour exploitation;
- Findings from audits or supplier reviews.

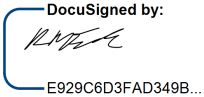
9. Forward Looking Objectives

- Continue to embed supplier onboarding processes as a part of responsible procurement. Our onboarding processes are now embedded and are being followed in relation to all new suppliers.
- Continue to monitor existing suppliers, repeating compliance checks and auditing as appropriate.
- Continue to raise awareness of Modern Slavery and human rights among our own employees and our supply chain.

10. Board Governance and Approval

Governance of modern slavery risk sits with the Board of Directors, which has ultimate oversight and accountability for this statement. The Chief Risk Officer provides at least an annual update to the Board on modern slavery risk, due diligence findings and any remediation activity, enabling the Board to challenge and direct our approach. The Board is responsible for approving this statement prior to publication.

This statement has been approved by Raylo Group Limited Board of Directors and is reviewed and updated annually.

Signed:  E929C6D3FAD349B...

Richard Fulton
Director & CFO