



Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the Aptia Group's commitment to addressing any risk of modern slavery and human trafficking arising within our business and supply chain by taking appropriate action where necessary to improve our corporate practices and adopting a zero-tolerance stance to modern slavery and human trafficking in our organisation and our supply chain. Any reference to "Aptia", "The Aptia Group" or "the Group" in this statement refers to Aptia Group Holdings Limited and all its subsidiaries.

Our Business

Aptia is a trusted provider of employee benefits and pensions administration services, with offices in the UK and US, supported by shared services in India and Portugal. It has 3,500 employees and manages programmes covering over 7 million people and serving more than 1,100 clients.

Our Purpose and Values

We are committed to providing fair and ethical services to our clients.

As the nature of our business involves understanding and meeting the business needs of our clients, it is important that we provide clear and transparent information regarding our services and that we are easy to engage with. We must have our clients at the heart of business, in line with our purpose and values.

Our behaviour and actions are led by our three core values:

- We are Thoughtful.
- We are Specialists.
- We are Responsive.

Our Supply Chain

Our third-party service providers, suppliers, contractors and business partners ("Third-Party Service Providers") include any separate legal entity contracted by Aptia to use, handle or process assets or provide goods and/or services to or on behalf of Aptia.

Our relationships with all our Third-Party Service Providers are underpinned by a detailed procurement process and contracts setting out our expectation that they will adhere to the same high standards that we set for ourselves. For any new Third-Party Service Providers, this includes a due diligence verification process.

Our policies on Slavery and Human Trafficking

We regularly review and update all our policies and have several policies in place that reflect our commitment to ensuring there is no modern slavery or human trafficking in our supply chain or in any part of our business.

These include:

- Code of Conduct
- Anti-Slavery and Human Trafficking policy
- Whistleblowing Policy
- Procurement Policy
- Third-Party Risk Management policy
- Enterprise Risk Management and Risk Appetite Frameworks

Due diligence processes for Slavery and Human Trafficking

Aptia utilises Third-Party Service Providers to fulfil a variety of business services and takes appropriate care over their selection, appointment, and the oversight of the delivery of the services.

Inadequate risk management of our Third-Party Service Providers can lead to a failure to meet Aptia's operational business requirements, impact our clients and/or employees, give rise to regulatory breaches and potentially cause damage to our reputation.

As part of our initiative to identify and mitigate such risk we have the following due diligence procedures, systems and controls in place:

- We only engage a Third-Party Service Provider once the appropriate background and onboarding checks, and approvals have been received and cleared.
- Our Third-Party Service Providers are expected to ensure continued compliance with applicable laws and regulations, and the contractual commitments made at the point of onboarding.
- Action is taken where a Third-Party Service Provider does not meet the expected standards.
- We continuously monitor and assess potential risk areas in our supply chain.
- We protect whistleblowers.

In addition, Aptia has an established 'Three lines of Defence' (3 LOD) model that manages and oversees the management of risks across the firm.

The **First Line of Defence** (1st LOD) owns the risk associated with third parties.

The **Legal, Risk and Compliance Function** (2nd LOD) are responsible for oversight and independent challenge of the Third-Party Risk Management policy by the 1st LOD.

The **Internal Audit function** (3rd LOD) is responsible for the independent review and assessment of the 1st LOD and 2nd LOD and provides independent assurance to the Senior Management and Board on the design and effectiveness of the Third-Party Risk Management Policy and process.

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Delivery of appropriate training to our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business.
- Development of key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking are not taking place in any part of our business or supply chain.

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 31 December 2023. It has been approved by the Board of Directors of Aptia Group Holdings Limited.

17 December 2024

DATE



Bala Viswanathan

Founder and Group Chief Executive Officer

APTIA GROUP HOLDINGS LIMITED