

Anti-Slavery Statement

for the financial year ending 30 September 2025

This statement is made on behalf of the AJ Bell Group and sets out the steps taken to tackle modern slavery and human trafficking, pursuant to Section 54 of the Modern Slavery Act 2015 (the 'Act').

Purpose and scope of this statement

Modern slavery is a crime resulting in the abuse of human rights. It comprises various offenses, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

AJ Bell is a UK FTSE 250 listed company, regulated by the Financial Conduct Authority. We do not operate a complex supply chain and therefore we consider that the risk of modern slavery and human trafficking occurring within our operations and supply chain is low. Nevertheless, we are strongly committed to opposing modern slavery and to ensuring that all our business activities and relationships are conducted ethically and with integrity.

We implement effective systems and controls within our business to help mitigate the risk of modern slavery occurring. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

Organisation's structure, our business and our supply chains

AJ Bell is one of the UK's largest providers of online investment platforms and stockbroker services. With more than 670,000 customers and assets under administration of £108 billion, we succeed by providing award-winning investment products, backed up with excellent service and online functionality at a low cost. We employ over 1,500 people based across our Manchester, London and Bristol offices.

As one of the UK's leading investment platforms, our aim is to help our customers take control of their investments. We want them to have peace of mind because they are investing in their futures, and closing the gap between where they are today and their aspirations for later in life.

Our guiding principles are the foundation of our company culture; they help drive our behaviours and decisions and place our customers at the heart of everything we do. All staff are encouraged to use the principles to guide them on how to make decisions and how to conduct themselves. In this way, we ensure a strong, cohesive and inclusive company culture where everyone embraces the same core set of values.

Our guiding principles:

- Principled – we act with integrity
- Knowledgeable – we know our stuff
- Straightforward – we simplify the complex
- Personal – we put people first
- Ambitious – we set high standards

We are a UK-focused company, and our platform operates a dual-channel approach: to both direct-to-customer (D2C) and advised clients. We also offer investment solutions through our in-house AJ Bell Funds and Managed Portfolio Services. The vast majority of our third-party suppliers are also based in the UK.

As part of our contracting processes with our third-party suppliers, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Policies in relation to anti-slavery and human trafficking

Our AJ Bell Group Anti-Slavery Policy applies to all persons working for us or on our behalf in any capacity. The policy outlines the responsibility of AJ Bell employees to report suspicious activity, and how to raise concerns. The policy is owned by the Chief Risk Officer and approved by the Board on an annual basis. The Board of Directors has overall responsibility for ensuring the policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Anti-Slavery Policy is referenced in our employee handbook, so it has an important and visible place for all employees.

AJ Bell's Recruitment Policy embeds modern slavery prevention by ensuring all hiring is conducted directly, ethically, and transparently. Candidates are assessed against justified role requirements, and mandatory Right to Work checks, and agency controls mitigate exploitation and human trafficking risks. The policy is regularly reviewed, monitored, and reinforced through training and case-based learning.

We have a Grievance Policy and Procedure in place for employees to follow when they wish to raise concerns. This encourages employees to discuss concerns with managers initially, unless the matter is serious and needs to be escalated to senior management or HR. The employee has the opportunity to attend a formal grievance meeting with an independent manager, who will consider appropriate remediation. The Grievance Policy and Procedure has been drafted in line with the ACAS code of conduct to ensure we are following legislation and best practice.

We also have a separate Whistleblowing Policy so that employees can raise concerns without fear of retaliation. An external whistleblowing reporting mechanism is available to ensure anonymity and protection. The policy is overseen by the Whistleblowing Champion and the Compliance Monitoring function, ensuring proper investigation and escalation of reported matters.

The AJ Bell Sustainable Procurement Policy outlines AJ Bell's approach to responsible business, explains the environmental and social risks present in our supply chain, and details our approach to managing these risks. This includes our commitment to tackling modern slavery within our procurement practices.

Our Anti Bribery and Corruption Policy outlines the standards that AJ Bell Group employees must follow to prevent bribery and corruption. AJ Bell conducts all business with honesty and ethics, and we are strongly opposed to any bribery and corrupt activities. We are committed to acting

professionally, fairly and with integrity in all dealing and relationships, including with our supply chain.

Our Equality, Diversity and Inclusion (EDI) Policy outlines AJ Bell's commitment to eliminating discrimination, promoting equality, diversity and inclusion in how we operate, and seeks to provide a work environment in which all employees are treated with respect and dignity that is free from harassment.

All these policies go through at least an annual review to ensure that they are in line with updated requirements, and all are available for employees to access on the company intranet site.

Due Diligence and Risk Assessment processes in relation to slavery and human trafficking in our business and supply chains

AJ Bell is a UK based company with the vast majority of our suppliers also based in the UK. We do however ensure that necessary measures are in place to identify and mitigate the risk of modern slavery and human trafficking from occurring in any part of our supply chain.

Our Third-Party Supplier Management Policy sets out our approach to management of third-party suppliers and assists in our risk assessment of new suppliers. We seek to prevent customer harm as a result of poor service from third-party suppliers or as a result of poorly managed third-party contracts. We have a robust selection process when it comes to appointing potential new third-party suppliers. This includes a detailed Request For Proposal (RFP) and Due Diligence Questionnaires (DDQ).

As part of the supplier onboarding and contract renewal process, our suppliers are required to demonstrate they have modern slavery policies in place. In addition, all important third-party suppliers at onboarding and on an annual basis complete a comprehensive DDQ covering the adequacy and implementation of key policies, including those relating to modern slavery, fraud prevention, compliance with anticorruption and antibribery legislation, conflicts of interest, data protection, employment practices, crisis and incident management, and cyber security.

Training

All new starters within HR, Risk & Compliance, Procurement and Commercial are required to attest to reading and understanding the AJ Bell Anti-Slavery Policy.

In addition, there is role specific “How to Identify Modern Slavery” training which is assigned to new employees in key functions including HR (including recruitment), Technology Services Management, and Commercial. This training is delivered through an internally-developed module supplemented by an external education video provided by the Gangmasters and Labour Abuse Authority (soon to be absorbed into the Fair Work Agency): AJ Bell was granted permission to incorporate this within our training programme.

We are reviewing our policy to look to introduce this as mandatory training for additional staff this year.

As part of the induction process all new employees are also subject to mandatory training on Anti Bribery and Corruption practices.

Effectiveness of measures

At the time of this statement, no reports have been received relating to modern slavery in our businesses or supply chains, however we realise that the risk is still present and we continually strive to ensure our processes are effective so anyone can report any instances of wrongdoing. We are constantly seeking ways to improve the processes managed by our business units and corporate functions.

We are committed to playing our part in advancing the United Nations Sustainable Development Goals (UN SDG) through our responsible business strategy. As part of this commitment, we have identified five key UN SDG targets that closely align with our purpose, values, and long-term sustainability priorities.

One of these key targets is Reducing Inequalities, which sits at the heart of our approach to responsible business. Our focus in this area ensures we continue to promote fairness, inclusion, and equal opportunities across our organisation, supply chain, and wider stakeholder community.

Our commitment to growing responsibly is reflected in the progress we have made across all areas of our responsible business strategy this year. This includes developing innovative propositions that make investing easier, building an inclusive and high-performing culture, supporting our local communities and minimising our environmental impact. These efforts have contributed to an improvement in our MSCI ESG rating in the year, demonstrating the impact of our responsible approach.

Peter Birch
Chief Financial Officer
14 March 2026

Approved by the Board of AJ Bell plc on 26 March 2026 and signed on its behalf by a director, Peter Birch