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MODERN SLAVERY ACT STATEMENT

Modern Slavery and Human Trafficking Statement made on behalf of Coventry Building Society and its subsidiaries Godiva Mortgages Limited and ITL Mortgages Limited (collectively the "Society") further to section 54 of the Modern Slavery Act 2015. It does not cover its subsidiaries post the Society's acquisition of the Co-operative Bank on 1st January 2025.

ABOUT US

Coventry Building Society has been looking after our customers' and their finances since 1884, and we are proud to be one of the UK's strongest building societies. The Society is the second largest building society in the UK. As of 31st December 2024, the Society held assets in excess of £62 billion, serving over 2 million members and employing over 3,000 people.

We trade as Coventry Building Society and as at 2024 had two trading subsidiaries, Godiva Mortgages Limited and ITL Mortgages Limited. We are headquartered in Coventry and all our customer service and head office teams are located in the UK.

On 1st January 2025, Coventry Building Society took ownership of The Co-operative Bank, bringing this 154-year-old organisation back into mutual ownership. As of 30th June 2025, this transformational combination has created a purpose-led financial services organisation with nearly 6,000 colleagues and total assets of approximately £90 billion. The new Group provides a broad range of services across personal finance and business banking, meeting the needs of over 4 million customers across the UK.

The period of this statement covers January to December 2024. We have published this statement for the Society and there is also a separate statement for the Bank. We have kept the statements separate for 2025, since the whole reporting period was prior to completion of the acquisition on 1st January 2025

The new Group brings together two ethical and sustainable businesses. In 2023 the Society was the first UK building society to gain B Corp status, a globally recognised standard of sustainability, and the first UK building society to be awarded the ISO 20400 sustainable procurement standard. Modern Slavery is incorporated into both of these in relation to the monitoring of supply chain. The Co-operative Bank first introduced a customer-led ethical policy in 1992 and consults its customers regularly to ensure its status as the original ethical bank is maintained.

Coventry Building Society are authorised by the Prudential Regulation Authority (PRA) and regulated by both the Financial Conduct Authority (FCA) and the PRA.

Further details about the Society's financial performance and strategy can be found in the 2024 Annual Report and Accounts, which pre-date the Society's acquisition of the Bank.

Docusign Envelope ID: 8231EC99-72CA-463D-A941-15383DB4B1A2

OUR APPROACH

The Society has zero tolerance to slavery and human trafficking both within its own operations and its supply chains. The Society is committed to taking all reasonable steps to ensure that there is no modern slavery or human trafficking in supply chains or in any part of our business.

OUR SUPPLY CHAIN

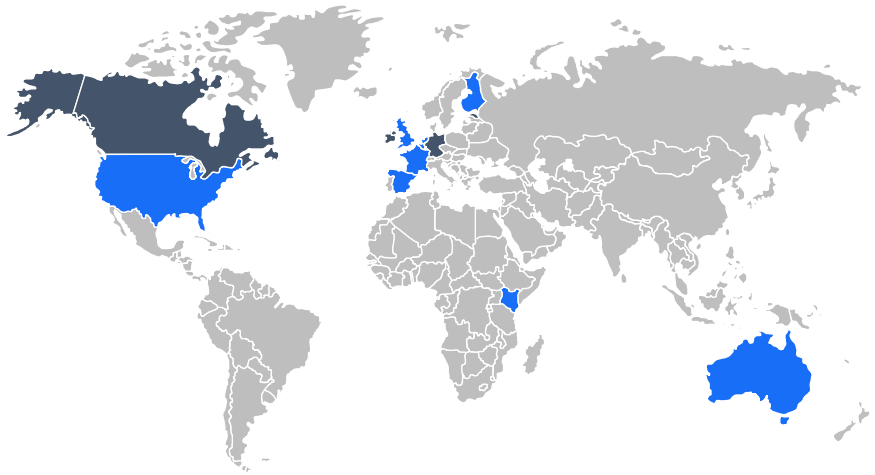
The Society does not manufacture or supply any goods. The Society's suppliers support our functions and the provision of financial services to customers.

Suppliers are subject to screening and due diligence checks before entering into a contract, as well as regular risk assessment and ongoing monitoring of their risk profile.

We have internal procedures to ensure adequate procurement pricing, prompt payment and good planning to ensure that all activities carried out by the organisation are in keeping with contractual obligations.

All the Society's call and operations centres are operated by the Society in the UK and the majority of the suppliers are also UK based. Any supplier activity that takes place outside of the UK is expected to comply with all aspects of the Supplier Code of Conduct and is subject to due diligence checks.

Geographical locations of our suppliers



Country	Suppliers
Australia	1
Belgium	2
Canada	3
Estonia	1
Finland	1
France	1
Germany	1
Ireland	7
Kenya	1
Luxembourg	1
Netherlands	3
Spain	1
United Kingdom	790
USA	18
Total	831

Because of the nature of our business and supply chains, following careful assessment of the risk, we consider the risk of the presence of slavery or human trafficking in its supply chains to be low. However, we are not complacent in relation to these issues.

During 2024, the Society refreshed and re-published its Supplier Code of Conduct which sets out our expectations of suppliers and is based upon the principles detailed in the UN Global

Docusign Envelope ID: 8231EC99-72CA-463D-A941-15383DB4B1A2

Compact. Suppliers are subject to due diligence and continuous monitoring to cover these requirements. Amongst other things, these state:

No child labour – There shall be no recruitment of child labour. Suppliers shall not recruit or employ any workers under the age of 16 (or, if higher, the applicable legal minimum age for workers). Persons aged under 18 shall not be employed at night or in hazardous conditions.

Employment is freely chosen – All work must be conducted on a voluntary basis and not under threat of any penalty or sanctions. There shall be no forced, bonded or involuntary prison labour. Suppliers should not utilise forced labour, i.e. all work or service which is exacted from any person under the threat of any penalty and for which the said person has not offered themselves voluntarily. Workers must be free to leave their employer after reasonable notice.

Modern slavery – Suppliers shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force; and not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4 of the UK's Modern Slavery Act 2015, as amended, or other laws or regulations in effect. Suppliers shall include in their contracts anti-slavery and human trafficking provisions that are at least as onerous as those set out in this Code of Conduct and shall implement due diligence practices to support this. Suppliers shall notify the Society as soon as they become aware of any actual or suspected slavery or human trafficking in any supply chain connected to the Society.

The Society deems its approach to Procurement and Supplier Relationship Management as an effective measure to enforce a zero-tolerance approach to slavery and human trafficking. Suppliers are required to confirm their agreement and adherence to the Supplier Code of Conduct. Supplier due diligence, assurance reviews and continuous monitoring of adverse media is in place to enable ongoing assessment of suppliers.

OTHER AREAS RELATING TO MODERN SLAVERY AND HUMAN TRAFFICKING

The Society has a robust framework that prohibits modern slavery and human trafficking.

A whistleblowing process operates across the Society for members, suppliers and colleagues whereby concerns can be raised and escalated as applicable.

We continue to review relevant policies to ensure they comply with legislation and support its spirit. The purpose of our policies is to prevent, identify and address incidents of modern slavery and human trafficking as and when they arise.

Colleagues

We expect all colleagues to be treated fairly, with respect and dignity. Our Employee Code of Conduct applies to all colleagues (which includes employees and contractors). It sets out our values and our expectations of colleagues, and it includes a clear commitment to human rights. Employees are requested to attest to the Code of Conduct on an annual basis which incorporates confirming adherence to all required policies and processes.

Customers

Docusign Envelope ID: 8231EC99-72CA-463D-A941-15383DB4B1A2

The Society is committed to combatting financial crime and the misuse of our assets and systems by criminals. We have a framework in place to ensure we manage our financial crime risks, aligned to our legal and regulatory obligations.

Our branch colleagues have a clear escalation path when unusual customer behavior is observed. Our Financial Crime team investigate potential Modern Slavery or Human Trafficking activity, and we will exit relationships where indicators cannot be discounted. We will collaborate with the government, Non-Governmental Organisations (NGOs) and law enforcement to help identify and mitigate against modern slavery and human trafficking.

OUR WORKPLACE

All colleagues are recruited legally and must meet the 1999 Immigration Act and 2006 Immigration, Asylum and Nationality Act requirements. Relevant background screening checks are performed to monitor adherence to this. We do not have any reliance on seasonal workers and much of our contingent worker population is for professional and senior professional/technical roles.

Support mechanisms are in place for colleagues should any personal support be required linked to modern slavery or human trafficking concerns. This includes a 24 hour, 7 days a week employee assistance helpline and wellbeing programme.

Recruitment

We are committed to maintaining a sustainable pipeline of diverse talent against our competencies for success.

We do this by having clear frameworks for the recruitment team and hiring leaders, to ensure we always behave ethically and manage risk.

We do not provide any zero hours contracts. All colleagues have a guaranteed number of hours.

How we manage recruitment:

- Fixed term and permanent vacancies are managed by our in-house and on-site outsourced teams, as is contingent worker recruitment.
- Our Background Screening Policy details the level of checks that we will complete as part of the on-boarding process. This includes employment referencing, a criminal record check, fraud checks and checks in relation to financial sanctions.
- We use a reliable third party to conduct employment screening checks before the candidate's start date, to ensure we actively check their right to work in the UK.
- All candidates must pass the screening checks according to our policy before they can join the organisation.

Training

Colleagues are provided with training that's relevant to them and their role. In addition, the organisation is utilising a financial services industry digital training tool provided via the UK Modern Slavery Training Delivery Group, the UK Independent Anti-Slavery Commissioner,

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and Themis. This training supports the identification of signs of modern slavery. The organisation also ensures that our management teams have additional support which includes guidance to make sure the recruitment process is consistent and the organisations approach to managing suppliers is effective.

CONTROLS AND OVERSIGHT THROUGHOUT 2024

The Society operates a programme of supplier relationship management and audit activities. This programme is also subject to regular reviews by our internal audit function. Where any concerns arise, a full assessment would be made, and appropriate actions taken to address those concerns.

Monitoring of supplier due diligence has taken place throughout 2024, and no concerns or issues have been identified. In addition, no concerns have been raised from our suppliers or our whistleblowing process in 2024.

We conduct ongoing member monitoring and screening which supports the identification, reporting and escalation of modern slavery and human trafficking. This activity aligns to vulnerable customer reporting and escalation process.

NEXT STEPS

The Society regularly reviews its approach to tackling modern slavery and human trafficking. This helps us engage with suppliers to identify any ethical trading issues and incidents of slavery or human trafficking and take appropriate action.

Group wide training and awareness to all colleagues will be undertaken to cover vulnerable customers which incorporates modern slavery. Frontline colleagues will have enhanced and tailored training and accreditation process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement for Coventry Building Society for the financial year ending 31 December 2024.

Thank you for taking the time to read the Society's statement.

This statement has been approved by the Board of Directors of each of Coventry Building Society, Godiva Mortgages Limited and ITL Mortgages Limited on 30th September.

For and on behalf of:

Coventry Building Society
Godiva Mortgages Limited
ITL Mortgages Limited

DocuSigned by:
Steve Hughes
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Chief Executive

Steve Hughes

Date 17/11/2025 | 10:41:51 GMT