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Modern Slavery Statement



1. Introduction & Organisational Structure

Reclaim Fund Ltd ('the Company' or 'RFL'), was incorporated on 13 August 2010 and commenced operations on 28 March 2011. RFL is recognised by Government as an Arm's Length Body (ALB) and is wholly owned by His Majesty's Treasury. RFL is authorised and regulated by the Financial Conduct Authority, and operates independently with an appointed Board and Executive. (company no 07344884).

The principal activity of RFL is the collection and management of dormant asset monies. The Dormant Assets Acts 2008 and 2022 ('The Acts') enables those financial institutions and publicly listed companies that choose to participate ('participants') to transfer money from their dormant financial products to the Company. Surplus funds that are not required to meet reclaims are distributed by RFL to The National Lottery Community Fund and then onwards to good causes across the UK. The Acts also ensure that the right of original owners to reclaim their money is protected in perpetuity by transferring the individual's claim against their original asset provider to RFL.

We are committed to combating slavery and to maintaining a strong ethical framework across our supply chain and operations.

2. Our Policies

Our policies are embedded into our governance and are reviewed regularly. The following policies reflect RFL's approach to the Modern Slavery Act:

- Modern Slavery
- Whistleblowing
- Procurement & Outsourcing
- Sustainability Risk
- Ethics, Equal Opportunities, Diversity & Inclusion HR Policies

The Modern Slavery Statement has been produced on a voluntary basis and forms part of our Modern Slavery policy. The statement is reviewed and approved annually by the Board and signed by our CEO, who is the Accounting Officer for RFL. The underlying policy is approved annually by the Chief Financial Officer and approved by the Board every three years.

3. Due Diligence & Risks

Modern Slavery risks continue to be regularly reviewed by our Executive Risk Committee, Audit and Risk Committee and Board. Our primary risks, whilst determined as low, remain within our supply chain rather than directly within our own operations and employment, and the risk mitigation activities are addressed as per the detail given in this statement. RFL takes its responsibilities as an employer very seriously as demonstrated by its Living Wage, and Investors in People

accreditations. Our HR policies and procedures underpin this approach, and we work closely with all related parties to ensure we continue to meet the objectives of the Modern Slavery Act.

RFL's supplier management approach involves categorisation of our suppliers. The frequency and depth of monitoring and review of each supplier is dependent upon this categorisation and is explained in our Supplier Relationship Management Plan, which forms part of our Procurement & Outsourcing Policy and associated Manual.

During the reporting period, RFL utilised frameworks via Crown Commercial Service (CCS), the government's central purchasing body. Where we procure via CCS frameworks, these provide an additional level of assurance that suppliers meet modern slavery requirements.

RFL has a relatively small number of suppliers and service providers, primarily comprising professional services (including IT and advisory services), and as a result has adopted a 2-tier approach, tier 1 being those suppliers who publish a Modern Slavery Statement and tier 2 being those who do not.

- Tier 1: During the reporting period we reviewed the Modern Slavery Statements published by our suppliers to establish whether their stated approach meets the terms of the Modern Slavery Act. We notified our suppliers that a review of their statement had taken place and provided them with our own voluntary statement. We provided our suppliers with the opportunity to disclose reported incidents and update us with any further steps they are taking in relation to Modern Slavery within their business.
- Tier 2: For these suppliers, RFL communicated explaining that we comply with the Modern Slavery Act, provided them with our own voluntary Modern Slavery Statement and requested confirmation of their own compliance.

Any instances of non-compliance would be assessed and remedial action taken, initially engaging with the supplier to resolve any issues within an agreed timescale. If this is not resolved to RFL's satisfaction, then the contract with the supplier will be terminated and a different supplier sourced.

Modern Slavery mitigation, including consideration of ethical approaches/practices, forms part of the Tendering and Contract process undertaken for any new suppliers. RFL's suppliers are risk assessed regularly, and the key/higher risk suppliers are subject to additional monitoring, including consideration of Modern Slavery risks. These

activities can include regular face-to-face reviews and adverse media monitoring.

4. Key Performance Indicators

We measured and recorded the results of our Modern Slavery Act related risk assessments; this included Key Performance Indicators (KPIs) for key suppliers. In the period 1 April 2025 to 31 March 2026, our suppliers have not reported any identified instances of slavery in their supply chain or operations and all Modern Slavery KPIs have been met. RFL will continue to monitor and review the KPIs for the next financial year to ensure effectiveness.

Our Modern Slavery specific KPIs cover:

- Supplier breaches
- Supplier statement assessments
- Onboarding due diligence
- Annual assessment of our policy & statement
- Publication of RFL's annual statement
- Staff training

We remain committed to combating slavery and human trafficking and will continue to implement any appropriate changes and improvements within our processes.

5. Training

We roll out annual mandatory training to all our employees including Whistleblowing and Equality & Diversity. All RFL team members completed and passed this training between 1 April 2025 and 31 March 2026. Additional specialist training is provided to the relevant members of staff, including Modern Slavery training to Procurement staff. RFL will continue to monitor training needs in relation to the ongoing development of our Modern Slavery Policy and Statement and address any identified gaps accordingly.

6. Approval

This statement is voluntarily made pursuant to section 54(1) of the Modern Slavery Act 2015 and refers to the financial year ending 31 March 2026. This statement was presented and approved by the RFL Board on 8 July 2026.

Signed



Adrian Smith OBE

Chief Executive and Accounting Officer, Reclaim Fund Ltd
8 July 2026