

### **Modern Slavery and Human Trafficking Statement (the 'Statement') 2023**

This Statement is made on behalf of Paratus AMC (The "Company") pursuant to section 54(1) of the Modern Slavery Act 2015 ('the Act') and covers the financial year ending 31<sup>st</sup> December 2022.

The Company trading as 'Foundation Home Loans' is committed to ensuring there is no modern slavery or human trafficking in any part of its business or supply chain. The Company recognises that modern slavery and human trafficking exists across various industries and take a zero-tolerance approach to facilitating this within the Company's own operations.

#### **Our Business**

The Company originates Buy-To-Let and Residential mortgages as well as operating a loan administration and servicing business. The Company sells its products to individuals and businesses through professional advisers. The Company is incorporated in England and Wales with registered number 03489004. The Company's registered office is at 5 Arlington Square, Downshire Way, Bracknell RG12 1WA. The Company is authorised and regulated by the Financial Conduct Authority (FCA Number: 301128).

The Company operates in the United Kingdom but is ultimately owned by affiliates of certain funds controlled, managed and/or advised by Apollo Global Management, Inc a company listed on the New York Stock Exchange under ticker symbol APO and whose Global Office is at 9 West 57<sup>th</sup> Street, 42<sup>nd</sup> Floor, New York, NY10019.

As a business, the Company seek to identify any risks of modern slavery and human trafficking and any risk of it occurring within our direct suppliers through robust policies and processes.

#### **Our Supply Chains and Due Diligence**

Our supply chain includes the purchasing of goods and services that support the operation of our business. Consumables purchased include office supplies, marketing materials, IT equipment and services such as credit reference agency data, cleaning, and office fixtures and fittings. As the Company is not in an industry with a high risk of modern slavery, a risk-based approach has been implemented when reviewing its supply chains.

The Company has taken appropriate steps to ensure that slavery or human trafficking is not taking place in its supply chains by reviewing existing business and supply chains; reviewing its procurement processes; enhancing due diligence process; and conducting a risk assessment with due regard to the section and geographical locations in which the suppliers operate. The Company uses predominately UK suppliers and does not have any suppliers located in high risk jurisdictions. The Company is committed to ensuring that any supply chain used is free from these invidious practices.

As part of our due diligence processes, when seeking to enter into significant business relationships with third parties, the Company aims to ensure that such third parties are subject to a procurement process that seeks to safeguard against Modern Slavery. As part of this process a third party will be asked about compliance with the The Act (or equivalence). Adherence to the requirements of the Act is included in all new third-party contracts entered into and separately an attestation will be obtained from the third party that they comply with the The Act prior to the commencement of the contract. Thereafter, where the contract is for 12 months or more an annual attestation from the third party will be obtained on the anniversary of the contract commencement date to provide assurance of ongoing compliance.

Where there is an existing contract with a third party which does not incorporate any reference to the Act, an addendum will be issued to the third party, the effect of which is to update their contract to include inter alia the relevant contractual requirements to address compliance with The Act and the requirement for confirmation of compliance attestation on an immediate and, where appropriate, annual basis.

The Company will continuously review and implement improvements to its pre-contractual and on-going due diligence of third parties particularly around the provision of detailed information about their Modern Slavery (or equivalent) policies, processes and risk assessments, including the prevention of slavery and human trafficking within their own organisation and supply chains.

#### Agency workers and Sub-Contractors

Any employment agencies which supply the Company with agency workers or contracted staff will be advised of our Modern Slavery and Human Trafficking Policy and must confirm that they will comply with its terms or confirm a similar commitment to the steps outlined in this policy. The Company pays its employees and sub-contractors above the national living wage and is seeking to encourage its suppliers to also adopt this commitment.

#### Policies and Procedures

The Company's robust policy framework together with its values, ensures good practice, ethical behaviours, integrity and prohibits modern slavery and human trafficking. The Company continue to review relevant policies to ensure they comply with the legislation. The purpose of our policies is to identify, mitigate and resolve incidents as and when they arise. In addition to the Modern Slavery Policy, other associated policies including, recruitment, whistleblowing and procurement policies are used to protect against modern slavery.

#### Employees


The Company complies with, as a minimum, all employment law requirements in the UK and it ensures that all its employees and contracted staff have the right to work in the UK. Our employment contracts honour employee rights and the Company actively promotes employee welfare.

Training

The Company requires our staff to act with the highest standards of business conduct at all times to protect its reputation and contribute to a culture that is free from corruption, risk of compromise or conflicts of interest. These principles are supported by the Company's values and behaviours.

This Statement has been approved by the Company's Board of directors on 13 January 2023 and will be reviewed annually.

Signed on behalf of the Board of Directors by:



Name: Hans Geberbauer

Job Title: Chief Executive Officer

Date: 13 January 2023