

Recovia Ltd Modern Slavery Statement

Effective Date: 21 March 2026

Company: Recovia Ltd

Company Number: 16956861

Registered Address: 3rd Floor, 86-90 Paul Street, London, England, United Kingdom, EC2A 4NE

1. Introduction

Recovia Ltd ("we", "our", or "the Company") is committed to preventing modern slavery and human trafficking in all our business operations and supply chains. This statement sets out the steps we have taken and continue to take to ensure that slavery and human trafficking do not occur in our business or supply chains. We are committed to conducting business responsibly, ethically, and transparently.

2. Organisational Structure

Recovia Ltd operates primarily within the UK debt recovery and business finance sector, providing services to SMEs across the country. Our operations are largely UK-based, but we may engage third-party suppliers for technology, professional services, and administrative support.

3. Our Supply Chains

We recognise that modern slavery risks may arise through suppliers, contractors, and partners. Our supply chains include:

- IT service providers and software vendors
- Marketing, printing, and communications agencies
- Professional services such as accounting, legal, and recruitment
- Office and facilities management providers

4. Risk Assessment

We regularly assess the risk of modern slavery within our operations and supply chains. Key risk factors considered include:

- Sectors known to have higher risk of forced labour or exploitation
- Suppliers or contractors operating outside the UK or in high-risk jurisdictions
- Subcontracted or outsourced services with low transparency

At present, the majority of our suppliers operate in the UK and comply with UK employment laws, but we remain vigilant and require assurances regarding labour practices.

5. Policies and Procedures

Recovia Ltd maintains the following policies and procedures to combat modern slavery:

1. Supplier Code of Conduct: All suppliers are expected to comply with ethical labour standards and provide transparency in their workforce.
2. Recruitment Policy: We ensure all staff are legally employed, have the right to work in the UK, and are paid in accordance with UK employment law.
3. Whistleblowing Policy: Employees and suppliers can report concerns about unethical or illegal

practices confidentially.

4. Training: Staff responsible for procurement, HR, and operations receive guidance on recognising and mitigating modern slavery risks.

6. Due Diligence

We apply the following due diligence measures to mitigate risk:

- Evaluating potential suppliers and contractors for compliance with ethical employment standards
- Including anti-slavery clauses in supplier contracts
- Conducting periodic audits or reviews of high-risk suppliers
- Engaging with industry initiatives to share best practices and improve standards

7. Monitoring and Reporting

Recovia Ltd will monitor compliance with this statement by:

- Regularly reviewing our supply chain policies
- Ensuring staff are aware of modern slavery risks and reporting mechanisms
- Investigating any reports of unethical labour practices promptly and effectively

Any incidents of modern slavery or suspected exploitation are taken seriously and will be reported to the appropriate authorities.

8. Commitment to Continuous Improvement

We are committed to continually improving our approach to modern slavery risk management. Our objectives include:

- Expanding supplier engagement and transparency
- Strengthening employee training and awareness
- Collaborating with sector partners to ensure best practices are followed

9. Approval

This statement is approved by the Board of Recovia Ltd and will be reviewed and updated annually.

Signed:

Ben Portman

Director, Recovia Ltd

Date: 21 March 2026