

Modern Slavery and Human Trafficking Statement



Overview



Our Structure

Revolut Group Holdings Ltd is the ultimate holding company of the Revolut group of companies (the "Revolut Group" or "Revolut"); it is incorporated in the United Kingdom and registered with the Registrar of Companies for England and Wales under number 12743269.

As the ultimate parent company, it is making this modern slavery and human trafficking statement (the "Modern Slavery and Human Trafficking Statement") for the purposes of s.54 of the Modern Slavery Act 2015 on behalf of those subsidiaries listed below that meet the conditions laid down in s. 54(2) of the Act and are, therefore, required to make a Modern Slavery and Human Trafficking Statement in relation to the steps they have taken during the financial year to ensure that slavery and human trafficking is not taking place (i) in any of their supply chains or (ii) in any part of their own business.

Subsidiaries of the Revolut Group making the Modern Slavery and Human Trafficking Statement

This is the Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2025 of:

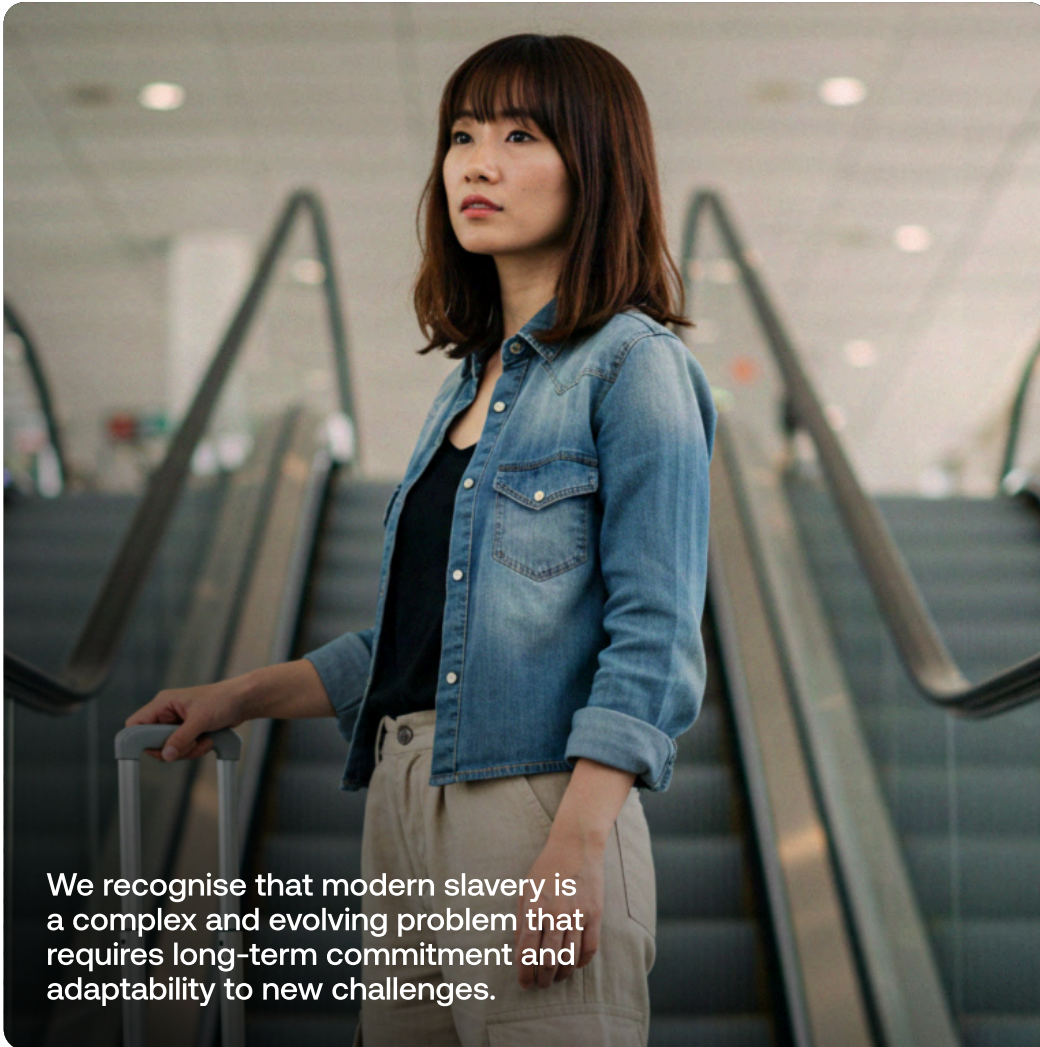
- Revolut Ltd, a private company limited by shares, registered with the Registrar of Companies under number 08804411, which is authorised and regulated by the Financial Conduct Authority (the "FCA") as an electronic money institution under firm reference number 900562, together with its branches and subsidiary undertakings in Cyprus, France, Germany, Hungary, India, Ireland, Italy, Lithuania, Mexico, Philippines, Poland, Portugal, Romania, Spain, and the United Arab Emirates.¹

¹ Revolut Ltd is also registered with the FCA under firm reference number 975775 to offer cryptocurrency services under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and is the appointed representative of Revolut Travel Ltd in relation to its insurance distribution activities. It also has non-operational subsidiaries in Russia and Ukraine.

Our services

Revolut is a fintech firm providing banking and payment services with presence across North America, South America, Europe, and Asia-Pacific. We offer services including, multi-currency cards, currency exchange, peer to peer payments and bank transfer solutions as well as cryptocurrency exchange, insurance, international transfers, investment and security services. Central to our customer offering is our "all things money" mobile app.

Our Approach to Modern Slavery and Human Trafficking



We recognise that modern slavery is a complex and evolving problem that requires long-term commitment and adaptability to new challenges.

Revolut opposes all forms of slavery which consists of, but is not limited to:

- human trafficking
- sex trafficking
- forced, unpaid and child labour
- national minimum wage violations

Our efforts to prevent and eradicate these abuses are central to our Group's strategy towards Environmental, Social & Governance (ESG) and our commitment to operating as a 'good corporate citizen' by behaving ethically and meeting our obligations to employees, customers and communities.

Our approach to modern slavery reflects our commitment to the human rights sub-pillar of the social responsibility element of our ESG Policy. This framework underpins our expectation that all operations, suppliers and partners uphold internationally-recognised labour and human rights standards.

We make this Modern Slavery and Human Trafficking Statement to set out the steps that Revolut takes to adhere to the requirements of the Modern Slavery Act 2015 and to reflect a drive to prevent and eradicate all forms of slavery in commercial organisations within our supply chain.

We recognise that modern slavery is a complex and evolving problem that requires long-term commitment and adaptability to new challenges. Revolut is committed to continuous improvement in our response to these risks, seeking to build on our actions year-on-year to protect vulnerable workers.

Our commitment to continuous improvement is evidenced by the systematic application of our governing frameworks. On a process level, we completed our scheduled annual review of our

internal modern slavery policies and procedures to ensure they remain fit for purpose and reflect any material changes in our operational landscape.

This is supported by our Three Lines of Defence model, where independent challenges from the second and third lines ensure our controls are not only designed correctly but operating effectively.

Our regulatory change procedures and external reporting policies have enabled us to track the timeliness and accuracy of our reporting and corporate disclosure obligations for relevant socially responsible activities, such as regular publication of our gender pay gap data in different countries. Furthermore, through our enhanced due diligence and annual progress tracking, we have successfully identified and addressed evolving risks in high-priority sectors, ensuring our protective measures result in measurable advancements in worker protection year-on-year.

In FY25, we proactively monitored the emergence of "right to switch off" legislation and industry best practices. We recognise that an "always-on" culture can contribute to excessive and compulsory overtime, which is a recognised indicator of forced labour. We integrated "right to switch off" principles into our Employment Handbook and Code of Conduct to reinforce our prohibition of any form of bonded or forced labour.

We identified that gaps in internal communication regarding support services can increase worker vulnerability. By treating well-being as a core component of our anti-slavery strategy, we aim to ensure that our workforce is resilient against the psychological and financial pressures often exploited by traffickers.

We launched a global internal campaign to reinforce the awareness of our employee well-being and mental health programmes. This ensures that all employees, particularly those in frontline functions, are aware of the support available to them and understand how to safely "Speak Up" regarding any form of exploitation or harassment.

Our policies

As an ethically-driven company, we are committed to conducting all business with integrity. We apply robust due diligence to identify the modern slavery risks across our operations and supply chains. Our approach focuses on jurisdictions, sectors and supplier types where the risk is most prevalent. These policies are overseen by senior management and the Board of Directors and are made accessible to all employees. Should modern slavery be detected, our approach would be victim-centered, focusing on remediation and support for survivors while holding perpetrators accountable. The Revolut Group uses the following policies to support the delivery of this commitment; these policies are reviewed at least annually to ensure they remain effective and aligned with evolving risks and statutory requirements:

Global Modern Slavery Policy

Our Global Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure that slavery (including human trafficking, sex trafficking, forced, unpaid and child labour, and national minimum wage violations) is not taking place at any point in our supply chains, our own operations, or the customer journey.

Our risk assessments identify our primary operational exposure within our business process outsourced functions in lower-wage economies and our direct facilities management (such as cleaning and security) in regions including India and the Philippines. We manage these risks through rigorous adherence to our [Third Party Policy Handbook](#) and targeted due diligence to ensure fair pay and voluntary labour standards are maintained across these critical service areas.

Global Whistleblowing Policy

Revolut is committed to fostering a “Speak Up” culture, in which colleagues feel encouraged, empowered and safe to speak up at all levels. Revolut’s Global Whistleblowing Policy encourages employees to report concerns about actual or potential misconduct, criminal offences, and non-compliance with applicable laws, regulations, and internal policies.

Revolut provides employees with multiple options to submit a whistleblowing disclosure via the Speak Up Portal, an open URL accessible to both internal and external stakeholders. The Speak Up Portal is Revolut’s primary whistleblowing channel, and is generally the easiest, fastest and most secure way to raise concerns. The Speak Up Portal allows employees to report whistleblowing disclosures anonymously, should they wish to do so. Employees can also raise concerns via email or letter directly to the Group Whistleblowers’ Champion (an Independent Non-Executive Director) or the Whistleblowing Team directly. To support our global footprint, the portal is accessible and does not prohibit individuals reporting in different languages or jurisdictions. All whistleblowing disclosures are handled confidentially and any concerns in scope of the Global Whistleblowing Policy are investigated in a fair, independent and confidential manner. Investigations are conducted by impartial personnel who are not involved in the business area to which the concern relates.

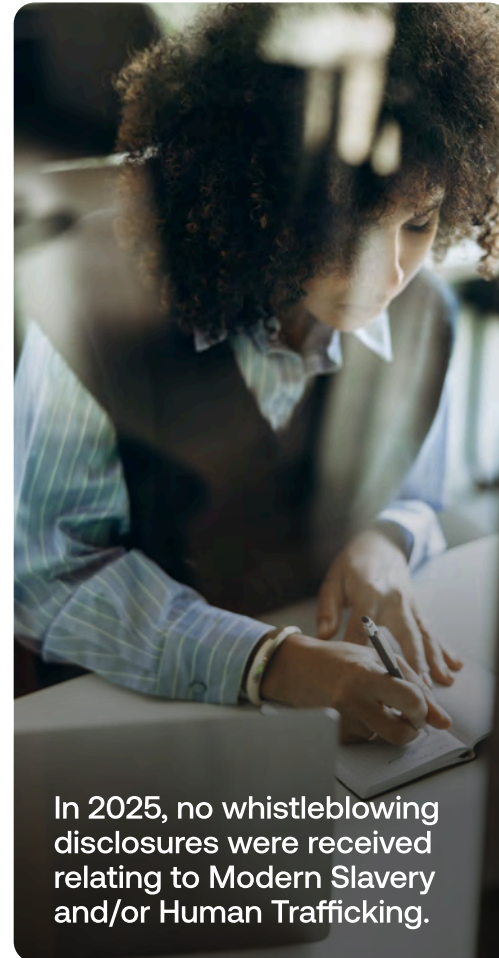
Revolut takes a zero-tolerance approach to any form of retaliation, victimisation or harassment against Whistleblowers. Any attempt to retaliate or identify a whistleblower as a result of submitting a disclosure is strictly prohibited.

Revolut’s Global Whistleblowing Policy is subject to an annual review, with revisions made as necessary to ensure continuous adherence to global minimum standards. In 2025, no whistleblowing disclosures were received relating to Modern Slavery and/or Human Trafficking. Nevertheless, Revolut remains committed to raising awareness, monitoring potential issues, and will fully investigate any concerns that are raised.

In 2025, an independent review was conducted on our Whistleblowing Framework as part of our internal risk plan. The review concluded that the framework is appropriately designed and operates effectively, meeting all applicable UK legal and regulatory requirements. This comprehensive assessment covered the entire whistleblowing process, including policies, mandatory training, reporting mechanisms, and the effectiveness of associated risks and controls.

Group Third-Party Risk Management Policy

The Group is dedicated to ensuring robust oversight and effective management of all third-party relationships. By implementing and maintaining rigorous systems and controls, Revolut consistently delivers high-quality services to its customers and partners, while adhering to ethical standards and complying with applicable regulations. The policy mandates risk-based due diligence across our suppliers and seeks to increase transparency further down the supply chain. Further details on our third-party due diligence procedures are set out below.



In 2025, no whistleblowing disclosures were received relating to Modern Slavery and/or Human Trafficking.

Employment Policies

The Group treats all employees with dignity and respect to foster an environment that is free from discrimination, harassment and any form of bonded or forced labour. Revolut’s commitment to respecting human rights in the workplace is embedded within the Group’s [Code of Conduct](#) and [Global Employee Handbook](#).

We adhere to fair labour practices by complying with equality and working-time legislation in the countries where we operate, ensuring that applicable limits on working hours are respected to prevent exploitation and protect employee wellbeing.

Furthermore, we support remote and flexible working arrangements in line with our internal policies; this provides our people with the autonomy to manage their own schedules, further reducing the risk of coercive work patterns and promoting a healthy work-life balance.

Revolut has procedures in place pertaining to our employment practices:

- Recruitment processes in line with local labour laws, including ‘right to work’ document checks, contracts of employment, and checks to ensure all employees are above the minimum working age.
- Revolut employees are made aware of their employment terms and conditions through a variety of channels including but not limited to written employment contracts, employee handbooks, and internal communications.
- Market-related pay and reward, which is reviewed regularly and linked to financial services benchmarks.
- Employees receive training on core human rights-related issues, including but not limited to diversity and inclusion, money laundering, third-party risk management, bribery and corruption and modern slavery and human trafficking awareness.
- A strict prohibition on the charging of recruitment fees to workers, in line with the ‘Employer Pays Principle’ - that no worker should pay for a job.
- Respect for the right of workers to freedom of association and collective bargaining.
- Our staff members have the freedom to terminate their employment and maintain control over their original identification documents.

Our Supply Chains

We understand that higher risk industries may be situated in both low risk countries and higher risk countries.



Revolut engages with a diverse range of third parties across various industries to support our global operations.

We recognise that the nature of these third parties varies significantly, with different industries carrying distinct levels of exposure to modern slavery and human trafficking risks.

Certain sectors we engage with are identified as higher risk industries for modern slavery; these include building services, cleaning services, security services, human resources service providers, recruitment and hiring agencies, travel and accommodation services, and mail delivery or courier services.

Conversely, other sectors are categorised as lower risk industries, such as IT services and communications (including customer support), financial institutions and payment processors, product and subscription partners.

We understand that higher risk industries may be situated in both low risk countries and higher risk countries. Therefore, rather than applying a uniform standard, we utilise a risk-based approach to ensure our oversight is proportionate to the potential threats identified. Within this framework, recruitment and hiring agencies are specifically recognised as part of the labour supply chain and are strictly subject to the 'employer pays' principle, ensuring that no worker is charged fees to secure employment.

Third-Party Due Diligence

Revolut deals with third parties for the provision of a range of products and services. It is our intention only to contract with third parties that can satisfy our internal standards with regards to employment and welfare conditions. To help identify the risk of slavery and human trafficking in our supply chain, we conduct pre-contracting due diligence and ongoing due diligence on third parties taking into account the following risk factors:

- the country in which the third-party operates (and has supply chains);
- the sector in which the third-party operates;
- the products produced, manufactured or supplied by the third party;
- the nature of the workforce used by the third party; and
- the third party's business model

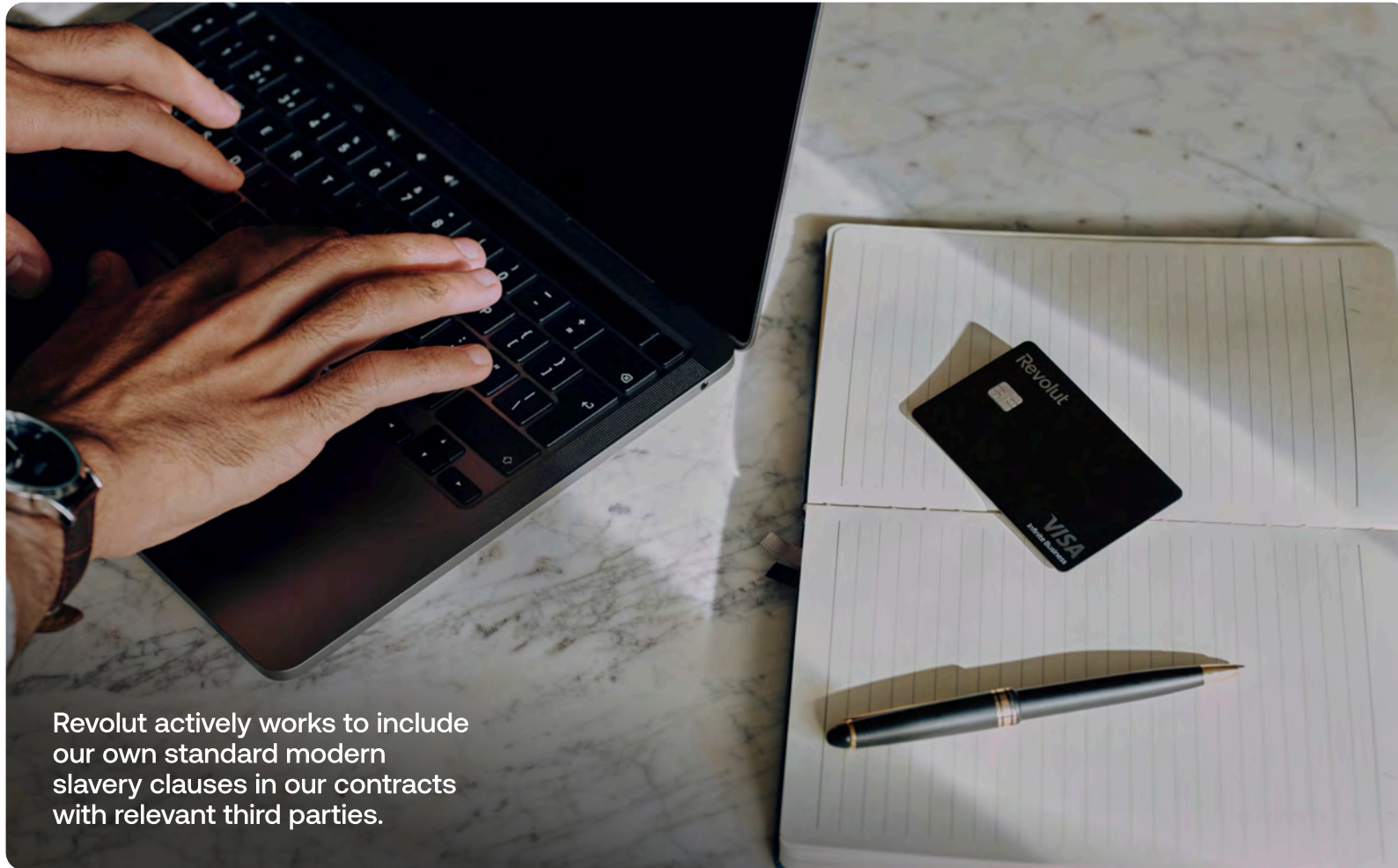
While standard due diligence is applied to all vendors, more rigorous enhanced due diligence is mandatory for third parties operating in high-risk sectors and jurisdictions.

We recognise that modern slavery risks can rapidly change; therefore, our due diligence is a continuous process integrated into the third-party lifecycle rather than a one-off activity.

All third parties are required to adhere to standards and expectations on (among others) labour and human rights set out in our [Third Party Policy Handbook](#), shared with them for acknowledgement on onboarding. Where a third party or outsourcing provider uses another party (i.e. a fourth party) to provide the agreed services to Revolut, this is considered a subcontracting agreement. When high risk subcontracting arrangements are in place, Revolut carries out due diligence to ensure that the third party or outsourcing providers have an appropriate level of oversight on the services performed by the fourth party.

If potential risks are identified, Revolut proactively engages with suppliers to prevent, mitigate, and remediate impacts. We prioritise worker welfare and the improvement of standards over immediate contract termination, which can often increase worker vulnerability, unless all other measures have been exhausted.

Customer Journey



Revolut actively works to include our own standard modern slavery clauses in our contracts with relevant third parties.

Revolut carries out risk assessments on all new customers and existing customers.

These checks are designed to reduce the risk of the on-boarding of customers that pose an unacceptable risk to Revolut of being used for the facilitation of financial crime, including activities related to slavery and human trafficking.

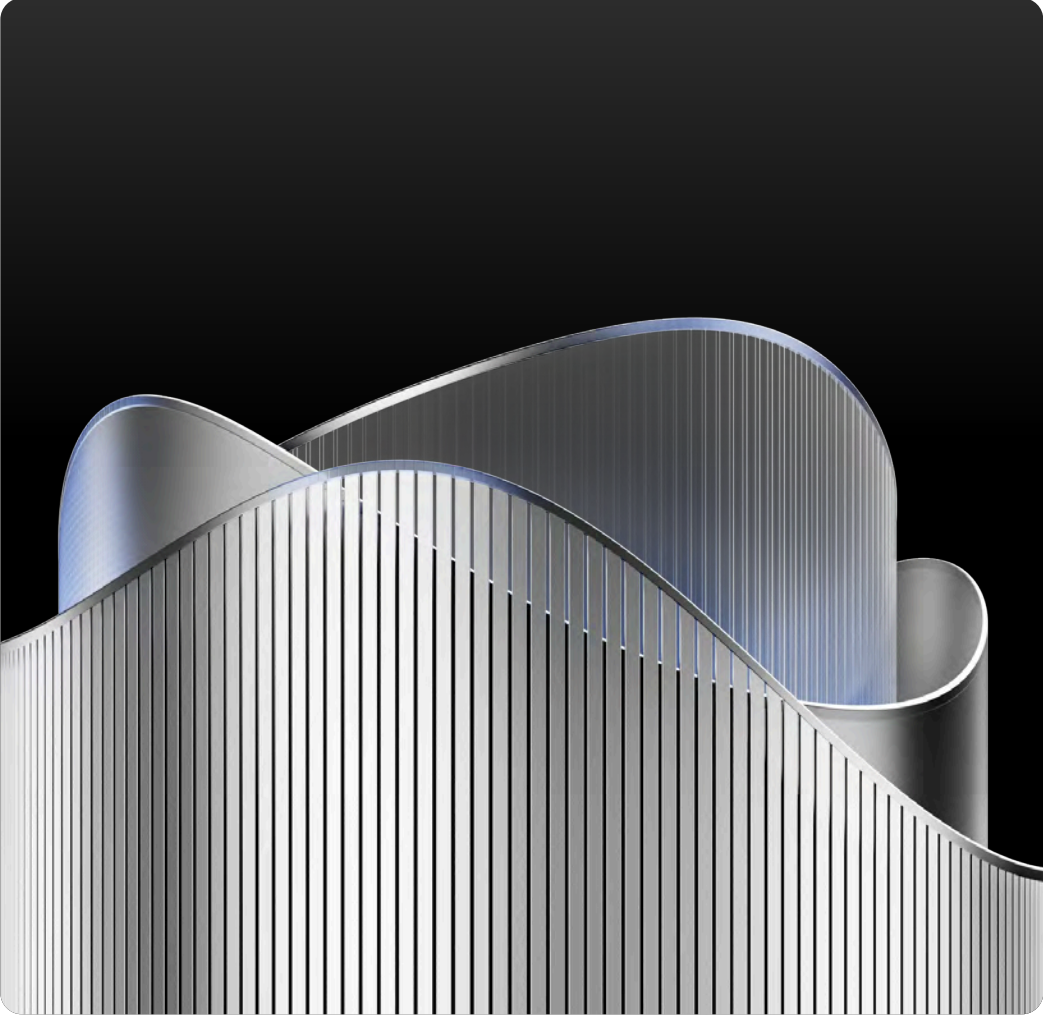
Further to these checks, we conduct monitoring on customer activities to identify and support potential victims of modern slavery. Should potential victims be identified, it is our policy to take a victim-centred approach to remediation.

Contractual Obligation

Revolut actively works to include our own standard modern slavery clauses in our contracts with relevant third parties. These clauses seek to manage modern slavery risks and ensure that we receive appropriate information on third parties' supply chains and organisations, including copies of their Modern Slavery and Human Trafficking Statements if they are required to report under the UK Modern Slavery Act 2015.

Our third parties have a contractual obligation to ensure compliance with all applicable laws that apply to their supply of goods and services to us, regardless of the jurisdiction in which they operate. This includes the UK Modern Slavery Act 2015 and any local legislation that is aimed at combating modern slavery. These requirements are supported by our broader risk-based due diligence and monitoring framework to ensure ongoing adherence.

Control Environment



We maintain regular independent assurance across our modern slavery control processes through our three lines of defence model, aligning our operational oversight with our low risk appetite for Environmental, Social and Governance (ESG) impacts.

Revolut is committed to the standards of a “good corporate citizen,” ensuring our foundational operations balance stakeholder interests without undue preference while strictly adhering to ethical and regulatory requirements.

Our First Line of Defence manages the day-to-day execution of controls, including the use of quantitative and qualitative data from our chat support features and internal whistleblowing channels for suspected or actual instances of modern slavery.

Our Second Line of Defence provides independent oversight and robust challenge to ensure these risks are managed effectively; this includes Compliance Assurance, which reviews different parts of the control environment periodically.

Our Third Line of Defence (Internal Audit) provides independent objective assurance on the design and operational effectiveness of these controls, and reports its findings to the Board of Directors.

While no instances of modern slavery were identified in our operations or supply chains during the financial year ending 31 December 2025, we remain vigilant and continue to refine our detection capabilities to ensure a robust response to this evolving risk.

Board Approval

This statement was approved by the board of directors of Revolut Group Holdings Ltd on 30th April 2026.

Signed by:

A handwritten signature in black ink, appearing to read 'N. Storonsky'. The signature is stylized and fluid.

Nikolay Storonsky
Director
Revolut Group Holdings Ltd