

The Revolut Group ("**Group**") and its member entities are regulated financial institutions and oppose all forms of slavery which consists of but is not limited to; human trafficking, drug trafficking, sex trafficking, and unpaid labour. We make this statement to set out the steps the Group takes to adhere to the requirements of the Modern Slavery Act 2015 and to reflect a drive to eradicate modern slavery in commercial organisations within our supply chain. This statement relates to the financial year ending 31 December 2020 and will continue to apply until amended. The Board of Directors of Revolut Ltd will review it at least once a year. As an ethically driven company, we will conduct all business with integrity, having a zero-tolerance approach to modern slavery and human trafficking risks. The Group has in place the following policies to achieve this.

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, drug trafficking, sex trafficking, and national minimum wage violations) is not taking place at any point in our supply chains.

Global Whistleblowing Policy

The Global Whistleblowing Policy encourages employees to play a key role in preventing and detecting wrongdoings within the company. Employees are encouraged to raise their concerns about any suspected or known criminal conduct or any other type of misconduct taking place through the company, its customers or third parties. Employees can raise disclosures anonymously and confidentially use Revolut's Whistleblowing Portal.

Group Third Party Risk Management Policy

The Group considers strong oversight and management of its material third party relationships to be an important risk management activity and is committed to maintaining effective systems and controls to ensure it provides a consistently high standard of services to its customers and partners.

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 Revolut's Code of Conduct and Employment Handbook.

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, and bribery and corruption.

Impact on Our Supply Chains

Our supply chains are made up of the following:

- IT services and communications including customer support activities;
- financial institutions and payment processors;
- building services;
- cleaning services;
- security services; and
- manufacturers of Revolut merchandise and products.

Third-Party Due Diligence

Revolut deals with third parties for the provision of a range of products and services. It is our intention to only contract with third parties who can satisfy our internal standards with regards to employment and welfare conditions. To help identify and monitor 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 the third-party operates in (and has supply chains in);
- The sector the third-party operates in; and
- The products produced, manufactured or supplied by the third-party.

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 subcontracting arrangements are in place, Revolut actively works to adopt appropriate contractual clauses that obligate the third party or outsourcing provider to conduct an appropriate level of oversight on the subcontracted services and provide information as may be required to evidence subcontractors are meeting the relevant regulatory obligations.

Contractual Obligation

We actively work to include our own standard modern slavery clauses in our contracts with relevant suppliers. These clauses seek to manage modern slavery risks and ensure that we receive appropriate information on suppliers' supply chains and organisations, including copies of their modern slavery statements if they are required to report under the UK Modern Slavery Act.

Our suppliers 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 and any local legislation that is aimed at combating modern slavery.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking, Revolut has established mandatory modern slavery e-learning that focuses on how we mitigate the risk of modern slavery and human trafficking in our supply chain, our third parties, our customer base and direct operations.

Modern slavery and human trafficking (including drug trafficking and sex trafficking) are crimes and those responsible will seek to launder the proceeds in the financial system to legitimise them. Revolut's Financial Investigation Unit ("FIU") within the Financial Crime Compliance function leverages intelligence, investigations, analytics, and technology to deter financial crime. This enables us to identify existing or emerging risk issues and financial crime quickly and effectively, to ensure that we are focused on how criminals seek to exploit our services in their pursuit of financial gain.

As part of our training, we encourage people to report any signs of modern slavery and human trafficking to local authorities. The training aims to develop employee awareness of what constitutes criminal activity, the indications of this and how to report concerns of suspicious activity.

Board Approval

This statement was approved by the Board of Directors of Revolut Ltd on 11 November 2021 and is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery and Human Trafficking Statement for the year ending 31 December 2020. This statement was signed by a Director of Revolut Ltd on 23 November 2021.